

NON-FINANCIAL REPORT 2021

Grupo OEP
Spanish IT
Adquico S.L.U
and subsidiaries



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1. A Message from the Chairman



We are proud to present our second non-financial report, prepared in accordance with the GRI (Global Reporting Initiative) International Standards Guidelines, and in line with our commitment to comply with the United Nations 2030 Agenda, contributing to the Sustainable Development Goals and the Ten Principles of the Global Compact.

Through this exercise, we demonstrate our commitment to transparent management and our concern for moving towards sustainable development, understood in all its forms: people, planet, prosperity, peace and partnership, in order to leave no one behind.

This report is a broad collection of the results which Grupo OEP Spanish IT Adquico, S.L.U. (Grupo VASS) achieved in 2021. We are committed to the upcoming challenges we will face, in response to the ongoing dialogue we have with our stakeholders. For this reason, we have renewed our adherence to the Global Compact, reaffirming our commitment to respect for human rights, the fight against corruption, and the guarantee of labour and environmental rights.

We are living in a historic moment; the crisis caused by the pandemic has had a profound social and economic impact worldwide. Today, more than ever, it is necessary to develop joint actions that will lead to recovery. We believe that the best way to continue contributing to this recovery process is by strengthening our organizational management, which, based on innovation, will allow us to jointly find and create new solutions for our clients through digital and technological transformation.

This has been a satisfactory year, in which we have continued to move towards the VASS@400 goal, an ambitious and solid project that has led us to expand our operations to eighteen countries, thanks to the creation and acquisition of new and existing companies, allowing us to be a leading player in digital solutions based on digital consulting and specialized in offering complete solutions in Big Data, Data Discovery, MDM, SOA, ECM, Web Analytics and Cloud Services, amongst others.

Our overall performance in integrating corporate management based on the criteria of sustainability has been positive:

Through our commitment to good governance, we made progress in defining our ethics policy and code of conduct; our harassment prevention policy and protocol; our program to combat corruption, bribery and money laundering; and the implementation of our whistle-blower channel.

Furthering our commitment to people, we generated more than 2,600 jobs around the world; we continued working on equal opportunities, achieving a 27% share of women in our organization, which is above the industry average in Spain (20%); we strengthened our family reconciliation program, through the smartworking model, and we offered more than ninety-five thousand hours of continuous training. As a result of this work, we have been recognized as the best ICT consulting firm with Spanish capital, and among the 100 best companies to work for in 2021 (Actualidad Económica Ranking, from the El Mundo newspaper).

In terms of our commitment to the environment, we achieved a significant reduction in energy power requirements (6%); we began measuring the carbon footprint at our main headquarters; we acquired new electric cars and continued with the development of the urban garden program in alliance with the Juan XXIII Foundation and Merlin Properties. We also underwent evaluation by international environmental benchmarks such as CDP and ECOVADIS, the latter of which awarded us a bronze medal.

Regarding our social commitment, we continue to strengthen the management of our Foundation, through which we channel high-impact social actions with both the academic and business sectors; we support innovative entrepreneurship projects and the creation of new start-ups; we work with strategic allies in the creation of new business opportunities for the sector; as well as in the field of educational cooperation and research.

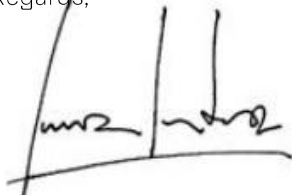
Turning to our commitment to our customers, we continue to expand our range of solutions and jointly create new value propositions, so that they, in turn, integrate sustainability criteria into their businesses; a point reaffirmed by their satisfaction levels with a rating of 8.17 (scale of 1 to 10).

With regards to our commitment to our supply chain, we defined the sustainable purchasing policy and presented the good practices guide for suppliers; we also implemented a new management program that allows us to strengthen sustained and responsible work with all our suppliers.

In addition, we submitted this report for verification by an external entity, in which, based on a rigorous evaluation, we obtained a favourable and unqualified opinion.

In short, we have added capabilities, experience and knowledge, based on a responsible business model that contributes decisively to sustainable development, and which we hope to continue strengthening in the coming years.

Regards,



Francisco Javier Latasa Vassallo

2. About this Report

This Statement of Non-Financial Information has been prepared in line with the requirements set forth in Law 11/2018 of December 28, 2018, amending the Commercial Code, the revised text of the Capital Companies Act approved by Royal Legislative Decree 1/2010 of July 2, and Law 22/2015 of July 20, 2015, on Auditing of Accounts, regarding non-financial information and diversity.

This report is evidence of our commitment to transparent management, and of our contribution to the fulfilment of the Sustainable Development Goals and the Ten Principles of the Global Compact.

It is based on the Global Reporting Initiative (GRI) Sustainability Reporting Guidelines and includes the information corresponding to the 2021 fiscal year of Grupo OEP Spanish IT Adquico, S.L.U. and subsidiaries (hereinafter referred to as VASS Group).

This report will be made available to the public free of charge and will be easily accessible on the website within six months of the end of the financial year and for five years thereafter.

3. Our Contribution to SDGs

With the approval of the 2030 Agenda in 2015, an action plan was established which, through 17 Sustainable Development Goals (SDGs) and 169 targets, seeks to promote fair and equitable development, understood to be based on five dimensions: people, planet, prosperity, peace and partnership, with the express goal to leave no one behind.

At VASS Group we are aligned with both the Agenda and the Sustainable Development Goals (SDGs). We are aware that our every act contributes to their fulfilment and that this is a global challenge in which people, companies and society must all contribute.

We form our strategy on the vision of responsible business, based on the principles of sustainability and our value contribution to all our stakeholders, thus allowing us to identify, more specifically, the SDGs that we impact directly and indirectly through our actions.

By doing so, we reaffirm our commitment to contribute to the fulfilment of goals related to quality of work and economic growth, the strengthening of industries and innovation, contributing to sustainable growth and the fight against climate change, respect for human rights and the promotion of diversity, access to quality education, institutional strengthening and the management of partnerships for development.

3.1 Direct Contributions



8. Decent Work and Economic Growth

We create solutions for each of our clients and we seek to respond to their growth needs. We generate a work environment that ensures the well-being of people and quality work.

Associated targets

8.1 Promote and contribute to the economic growth of the countries in which we operate.

8.2 Achieve higher levels of economic productivity through diversification, technological modernization and innovation.

8.5 Achieve full and productive employment and decent work for all women and men, including young people and those with disabilities, as well as equal pay for work of equal value.

8.8 Protect labour rights and promote a safe and secure work environment for all workers.

We define solutions aligned with the current market context, as well as anticipating possible problems our clients may have in order to improve their operational efficiency and boost their

growth. Solutions aimed at boosting the growth of SMEs, responding to the healthcare situation, as well as providing accelerators allowing clients to test new business models or concepts, are just a few examples.

We offer training and professional development programs, flexible compensation policies, family reconciliation programs, smart working, benefit plans and occupational health and safety policies to all the people who form part of the VASS family.



9. Industry, Innovation and Infrastructure

The sector in which we operate is growing rapidly. We anticipate new trends, generating innovative processes based on the criteria of sustainability.

Associated targets

9.5 Increase scientific research and improve the technological capacity of industrial sectors in all countries.

Innovation is one of our values and is in our DNA. We have an Innovation department, responsible for generating ideas and making them flow throughout the organization. An open innovation model in which we collaborate with customers, partners, start-ups and internal teams.



12. Responsible Consumption and Production

We incorporate best practices into our processes and work with our suppliers to positively impact the entire supply chain.

Associated targets

12.2 Achieve sustainable management and efficient use of natural resources.

12.5 Significantly reduce waste generation through prevention, reduction, recycling and reuse activities.

12.6 Encourage companies, especially large companies and transnational corporations, to adopt sustainable practices and incorporate sustainability information into their reporting cycle.

We incorporate sustainability criteria into our procurement policy, and we accompany and evaluate our suppliers in the implementation of best practices in their processes. We

encourage our customers, through our value propositions, to integrate sustainability criteria into their business. We submit annual progress reports on our performance. We have received the silver medal in the international Ecovadis evaluation.

3.2 Indirect Contributions



4. Quality Education

We work to continuously train people, believing in their talent and capabilities. We seek to expand and share our knowledge with society.

Associated targets

4.3 Ensure equal access for all men and women to quality technical, vocational and higher education, including university education.

4.4 Significantly increase the number of young people and adults who have the necessary skills, particularly technical and professional skills, to access employment, decent work and entrepreneurship.

4.7 To ensure that all students acquire the theoretical and practical knowledge necessary to promote sustainable development.

We facilitate staff access to training programs in technical, transversal and language skills, through educational training platforms.

Through our Foundation we support and promote digital talent, through actions in the fields of research, training, innovation and educational cooperation.



5. Gender Equality

We strengthen our strategy through the talent of our people, working to generate equal opportunities between men and women, and valuing the diversity of their talents.

Associated targets

5.1 End all forms of discrimination against all women and girls worldwide.

5.2 Eliminate all forms of violence against all women and girls in public and private spheres, including trafficking, and sexual and other types of exploitation.

5.5 Ensure women's full and effective participation and equal opportunities for leadership at all decision-making levels in political, economic and public life.

We have an Equality Plan, a Whistle-blower Channel and programs to prevent workplace and gender-based harassment. We offer work-life balance plans, flexible schedules, a smart working policy, and a responsible work philosophy based on trust.



13. Climate Action

We are aware of our capacity to join forces in the fight against climate change. We incorporate action and prevention measures in our policies, strategies and plans.

Associated targets

13.2 Incorporate climate change measures into national policies, strategies and plans.

13.3 Improve education, awareness and human and institutional capacity for climate change mitigation, adaptation and early warning.

We reduced our power necessity by 6% and began the process of measuring our carbon footprint at our main operations centre. We conducted awareness programs for all our staff - related to good practices and the efficient use of resources.



16. Peace, Justice and Strong Institutions

We work to ensure responsible and transparent management of our corporate governance, which protects security and privacy, and generates trust in all our stakeholders.

Associated targets

16.5 Significantly reduce corruption and bribery in all its forms.

16.10 Guarantee public access to information and protect fundamental freedoms, in accordance with national laws and international agreements.

We implemented our Anti-Corruption and Anti-Bribery Policy and set up a Whistle-blower Channel. We have disseminated, among all our staff, the management and prevention practices related to good governance. We promote the right to free association. We make public our annual progress reports on our social, environmental and good governance performance.



17. Partnerships for the Goals

In order to comply with our strategy and contribute to sustainable development, it is necessary to work jointly with the different stakeholders and across all levels of the organization.

Associated targets

17.16 Enhance the Global Partnership for Sustainable Development, complemented by multi-stakeholder partnerships that mobilize and share knowledge, expertise, technology and financial resources.

17.19 Build on existing initiatives to develop indicators to measure progress in sustainable development and complement gross domestic product, and support statistical capacity building in developing countries.

We continue to work hand in hand with our strategic partners, universities and public entities, through the establishment of development alliances, and the execution of programs and solutions that respond to the needs of all our stakeholders, and that allow us to achieve our organizational and sustainable development objectives.

4. Renewed Commitment to The Global Compact

WE SUPPORT



In 2017, we signed our commitment to comply with the 10 principles of the United Nations Global Compact. Now, four years later, we are renewing this pledge to responsible management and respect for human rights, the guarantee of labour rights, the environment and the fight against corruption.

We adhere to this initiative and accept these principles, committing ourselves to implement the necessary measures that will lead to the development of an increasingly comprehensive strategy, taking into consideration people and society, transparency in all our operations, and support for cooperative projects that contribute to the broader development objectives of the United Nations.

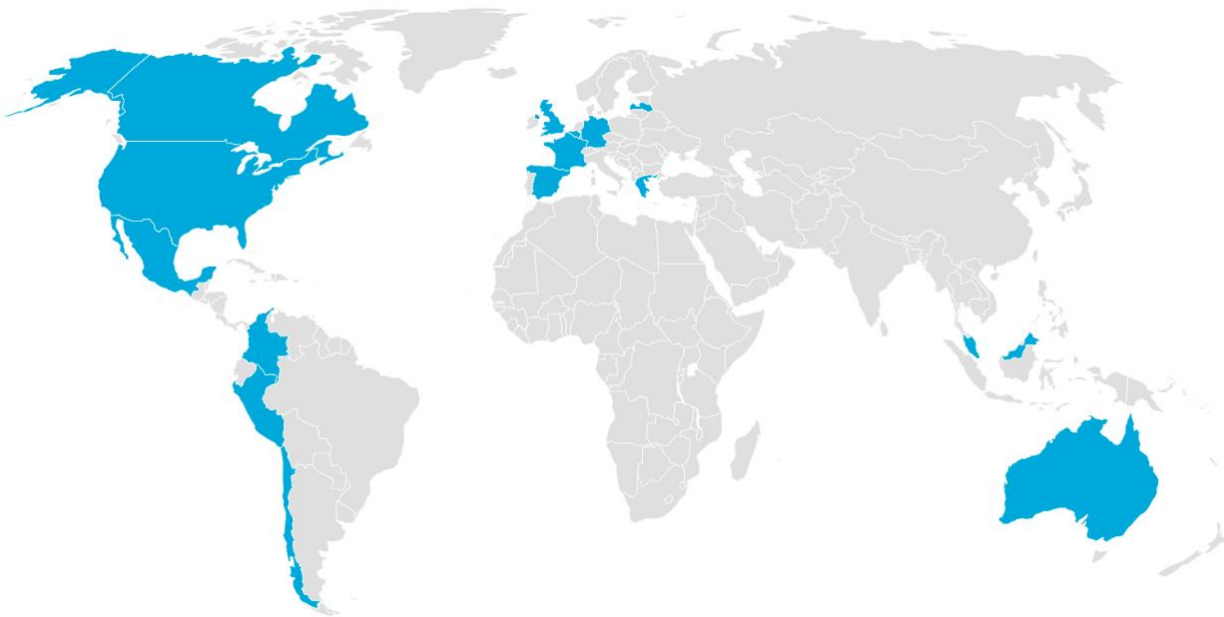
We are also committed to communicating, on an annual basis, the results of the progress of our activities to all interested parties and to the general public.

➔ <https://www.unglobalcompact.org/what-is-gc/participants/121401-VASS-Consultoria-de-Sistemas>

5. We are the VASS Group

5.1 Added value in solutions and services

We are a leading company in digital solutions based on digital consulting, and specialized in offering complete solutions in Big Data, Data Discovery, MDM, SOA, ECM, Web Analytics and Cloud Services, among others. We have 23 operation centres in 18 countries, and a workforce of more than 2,600 people around the world.



THE AMERICAS	EUROPE	ASIA	OCEANIA
Canada	Germany	Malaysia	Australia
Chile	Belgium	Singapore	
Colombia	Spain		
USA	France		
Mexico	Greece		
Peru	Latvia		
Canada	Luxembourg		
	Romania		
	UK		

Image 1. Countries and operation centres.

Thanks to our broad ecosystem of companies, we help large organizations in their digital transformation process, developing and executing the most innovative and scalable projects from strategy to operation. All with one goal in mind: to generate sustainable solutions, beginning with our own actions and projecting them to our stakeholders.



Image 2. Company ecosystem.

At the close of 2021, our turnover had risen to €205 million, of which 55% derived from Spain and 45% internationally. Throughout this year we have been immersed in the creation of our VASS@400 strategic plan, the economic objective of which is to generate revenues of €400 to €500 million by 2025 based on continued organic growth and the creation or acquisition of new companies.

Companies	Location	Stake
VASS Consultoría de Sistemas S.L.	Spain	100%
Serbatic Sistemas Tecnológicos, S.A.	Spain	100%
Nateevo Digital, S.L.U.	Spain	100%
VASS IT Services Limited	UK	100%
VASS IT Services US, Inc	USA	100%
VASS Consultoría de Sistemas Colombia S.A.S.	Colombia	100%
VASS Consultoría de Sistemas Chile Ltda.	Chile	100%
VASS Consultoría de Sistemas México S.A. de C.V.	Mexico	100%
Serbatic Sistemas Tecnológicos, S.A.	Mexico	100%
VASS Consultoría de Sistemas Perú S.A.C	Peru	100%
vdSHOP Redcom S.L.	Spain	100%
Comunyteck Consultores S.L.	Spain	100%
T4S Advance Solutions S.I.	Spain	55%
Ecenta A.G.	Germany Australia Canada USA Latvia Malaysia Romania Singapore Sweden	100%
Computer Resources International Group S.A.	Luxembourg, France, Belgium and Greece	100%

Table 1. VASS Group Companies.

5.3 Corporate Governance

Talent that joins forces to transform.

Our priority is to comply with the development of our strategy, based on compliance with the ethical principles of good governance and commitment to sustainability. Therefore, we work under a corporate governance model that ensures the application of our policies and compliance with the legal requirements established in each of the countries where we operate.

This structure is built upon the figure of the Chief Executive Officer (CEO), supported by a Management Committee, responsible for directing and supervising matters related to the performance of the organization in different areas. Together, these bodies are responsible for management and decision-making in the organization.

The governing body is currently composed of ten people, details of which can be found below:



VASS Inside

VASS Serbatic NATEEVO vdSHOP T4S Comunitytek ECENTA CRI Group

Image 4. Governing structure VASS Group

In addition, the different companies that make up the Group have a specific person whose responsibility it is to lead the implementation of the corporate strategy, and for reporting to the highest governing body on said actions, based on the social, environmental and good governance performance criteria established by the organization. This group is made up of ten people, as shown in the following image:

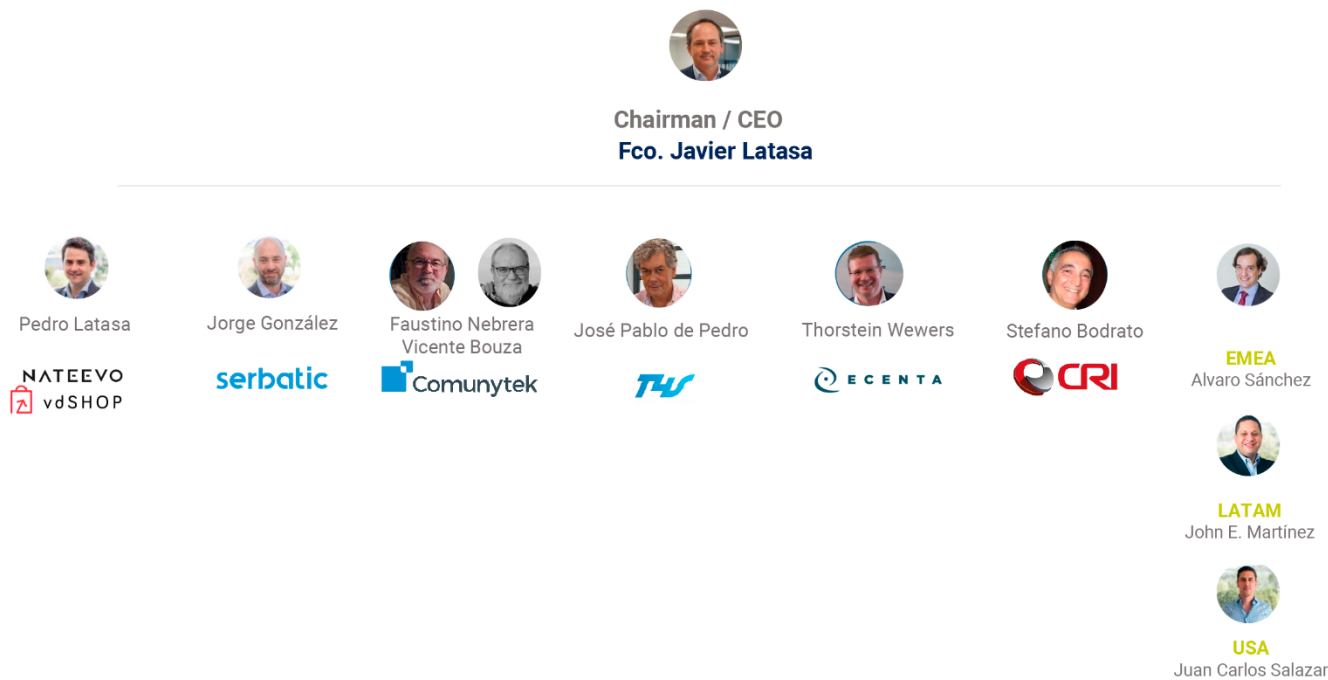


Image 5. Different individuals responsible for governance, by company.

5.4 Our purpose






VASS group: where business, technology and people come together.

We are not satisfied with just solving problems, we want to bring innovation and simplicity to the development of the companies of the future in order to drive people's growth.

Acting principles

- Ethical and responsible management.
- Commitment to our clients.
- Commitment to people.
- Respect for privacy and freedom of expression.
- Commitment to data security.
- Responsible management of our supply chain.
- Commitment to the environment.
- Commitment to the companies in which we operate.
- Integrity and transparency.

Values

	<h3>Agility</h3> <p>We move quickly due to our horizontal structure.</p>
	<h3>Commitment</h3> <p>As a result, our clients are highly satisfied.</p>
	<h3>Talent</h3> <p>People come first – they drive everything.</p>
	<h3>Innovation</h3> <p>Curiosity and ongoing improvement.</p>
	<h3>Simplicity</h3> <p>In attitude, methodology and results.</p>

Social Pillars



Innovation

Organizing advice workshops for smaller companies.



Training

Offering mentoring and technology workshops to at-risk groups.



Awareness

Seeking first-person experiences as part of a quarterly action plan.



Research

Supporting causes that allocate funds to research.

5.5 Our business model

Experts that make complex simple.

We work in the field of information technology, as well as in IT advice, consultancy and services; the development, promotion and distribution of applications (software), the import, purchase, sale and distribution of equipment (hardware), and their service and maintenance. We also focus on the processing and manipulation of data and information for the creation of databases and their subsequent commercialization.

We also provide advice and consultancy on business organization and administration, marketing, sales, staff selection and training, both to individuals and legal entities. We organize courses and teaching services for ourselves and for third parties, in subjects related to computers, business organization, administration, languages, consulting, marketing and sales.

Our value proposition is based on an offer of services of the highest quality, which responds to the needs of our clients and stakeholders, developed under a transparent management framework that seeks to create solutions for our clients, and support the definition and implementation of their business strategies, based on digital solutions that we build within the group, with impact derived from five dimensions:

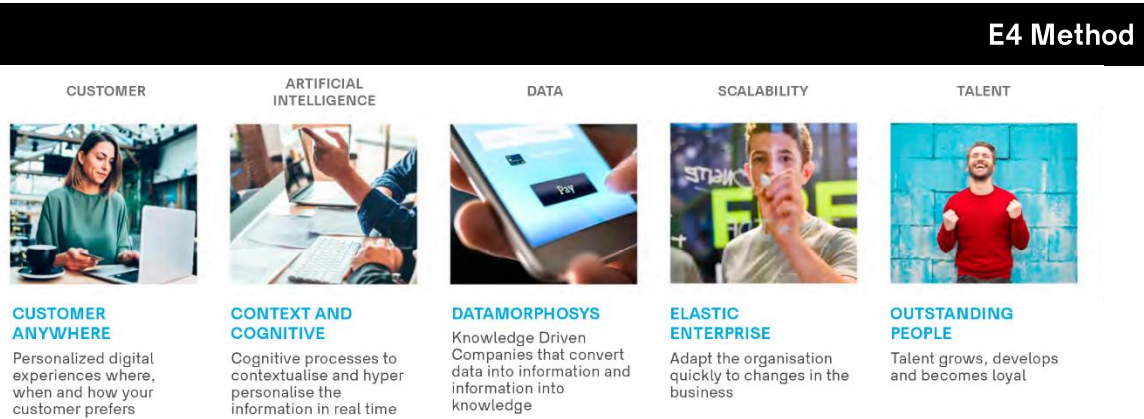


Image 6. E4 Method.

To this end, we use the E4 Method, our own method developed in four steps that covers the complete cycle that any initiative may require, from strategic definition to its operation.



Image 1. E4 Method

Through these strategies, we establish our operations in the Banking, Insurance, Telco and Media, Government, Industry, Travel, Energy and Utilities sectors, through the following business lines:

Business Line	Company
Digital transformation and solutions.	
Strategic design and marketing.	
Full e-commerce.	
Information technology and communication outsourcing services.	
Advanced systems and innovative products for wholesale banking and capital markets.	
SAP technology and advanced topics (Cloud, AI, IoT, Industry 4.0, robotics, blockchain and augmented reality).	
Customer Experience solutions based on SAP CX technology (Sales, Marketing and Commerce).	
Cyber security and digital transformation.	

Image 2: Business Lines

5.6 Growth and evolution

We are a growing company. We have solutions for any need.

With the backing of OEP Private Equity (One Equity Partners) since the end of 2020, we have been working on expanding our service offering to new markets through the creation and acquisition of great companies.

In July 2021 we created T4S Advanced Solutions, based in Spain - a company specialized in advanced topics related to Cloud, AI, IoT, Industry 4.0, robotics, blockchain and augmented reality on SAP-based business processes.

In the same month we acquired Comuntek, a Spanish company specialized in advanced systems and innovative products focused on wholesale banking and capital markets.

In October we acquired the German consultancy firm Ecenta, a company specialized in customer experience solutions based on SAP CX (Sales, Marketing and Commerce) technology, with its main market being the United States.

Finally, in November, we acquired CRI Group, a Luxembourg-based company specializing in cybersecurity and digital transformation, which provides services to official European Union institutions such as the European Parliament and the European Commission.

Thanks to these actions, we are expanding our value proposition to new segments and new markets around the world



Image 8. International presence

5.7 Our Strategy

We are all responsible: our commitment to society drives us to bring value not only to companies, but also to people.

We view our work from the perspective of responsible management based on sustainability principles; we understand that the greatest wealth is in our people, and in generating value for society. This principle is transversal across all the group's companies and is the basis that dictates all our actions.

By doing so, we generate value for all our stakeholders by working closely with our suppliers and partners across the different sectors in which the group operates, thus being able to offer 360° solutions to all our customers.

Talent	<i>A route to professional and personal development, diversity and equal opportunities for our varied talent and people.</i>
Clients	<i>A value proposition that ensures the highest quality services and the satisfaction of needs.</i>
Investors	<i>A responsible business practice that values the sum of human and financial resources.</i>
Suppliers	<i>Positively influence our supply chain, aligning values and criteria.</i>
Partners	<i>Shared objectives, unified value propositions that combine efforts.</i>
Society	<i>We add value to society, contributing to the construction of more sustainable communities.</i>

Image 9. Stakeholder value proposition.

We focus our efforts on the creation of shared value, focusing on identifying market trends, anticipating our customers' demands, and generating strategic alliances that allow us to expand our service capacity, without neglecting the quality assurance of our value offer.

We are in an ongoing search for continuous improvement and innovation, recognizing the great challenges posed by the current context, especially in the face of the economic and social recovery process arising from the crisis caused by Covid-19 around the world.

We are certain that our strategy must be based on principles of responsibility and transparency, meeting the demands of a dynamic market, new security challenges and the increasingly pressing needs of social transformation.

Therefore, we align our purpose and our actions through the definition of a strategy that involves our entire business model and stakeholders, making us a benchmark of commitment to the generation of value and sustainable development.

Innovation: Digital ecosystem of the future

We are a company that innovates by listening.

Responding to the digital needs of companies requires a high level of specialization in strategy, design, technology and operations. We have distributed this knowledge within a group of top-tier companies offering comprehensive answers to their needs.

We seek to be a vital cog by offering our clients value propositions that generate technological opportunities for their businesses and provide solutions to the challenges they face every day. We seek to add value to society, developing digital talent and positioning ourselves as a brand for attracting and retaining talent.

We understand innovation as part of the organization's DNA and, therefore, we generate an open ecosystem, where ideas are managed, and a responsible vision of the future is integrated with our commitment to society.

Stemming from the Innovation and Business Value departments, as well as the open collaboration project known as Innovation Depot – currently managed through the VASS Foundation, we seek to offer joint solutions and facilitate collaboration between staff, clients, start-ups, universities and investors, in order to face up to the challenges of the new digital environment.

In this way, we develop actions built upon three main pillars, as follows:

Pillar 1. Ongoing observation of the open innovation ecosystem.

Active listening: clients, start-ups, trends, and use cases.

Innovation Depot: collaboration with partners, supporting start-ups and participation in innovation ecosystems.

- **Driven Innovation:** ideas that could be put into action through R&D&I programs or in alliance with universities and other entities.
- **Product management:** promote a culture of reuse, anticipate solutions to needs.

Pillar 2. Creation of Value Propositions.

Offering: working with clients to design value propositions that respond to the criteria of sustainability.

Pillar 3. Constant search for new experiences and opportunities.

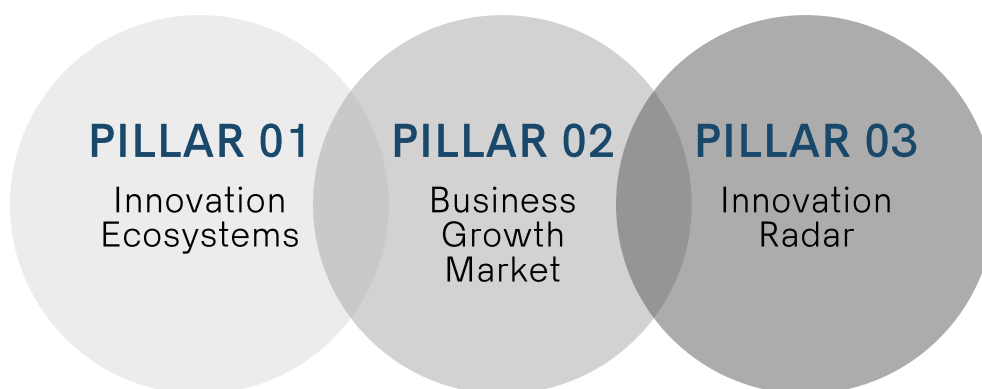


Image 10. Innovation strategy pillars.

In order to generate a shared vision and create a unified value proposition, we work hand in hand with the different business areas, co-creating and designing technology-based strategies and strengthening our internal culture of innovation. With the incorporation of new companies into the group, we intend to scale our strategy, first to those that are part of the European consortium and then to the rest of the countries.

As a result of the work carried out throughout this year, we took the following actions in the Innovation department:

325 technologies on VASS Tech RADAR, of which 110 are in the evaluation process, testing or adoption process.

59 new digital concepts for clients.

56 new active listenings

15 innovation sessions for partners and clients.

We also carry out activities through the VASS Foundation in the field of innovation:

15 listening and interaction sessions with 11 different start-ups.

10 start-ups supported in the Innovation Depot.

Alliance with Alcobendas town council, in Madrid: 7 challenges launched in the start-up program (Blockchain, Bigdata, 5G, Cybersecurity, Digitalization of processes, IoT, Sustainability). Of these, pilots and collaborations with 8 start-ups are planned.

With the Business France program from the Embassy of France in Spain, we conducted prospecting sessions to offer business solutions to clients in Spain.

5.8 Our risk management model

Risk assessment is part of our culture.

Based on our principles of ethics and good governance, we promote actions throughout the ecosystem of companies that make up the group, related to early identification of risks, impact analysis, timely management, and ongoing monitoring and evaluation.

We believe that proper risk management begins with prevention and is not possible without the commitment of all our stakeholders and of the people who are part of our team. For this reason, we promote a corporate culture based on good management practices, with actions that allow us to strengthen ourselves from within, through awareness and training processes aimed at all levels of personnel, as well as the development of internal audits of the Integrated Quality and Environmental Management Systems certified under the ISO 9001 and 14001 standards, and Information Security and IT Service Management certified under the ISO 27001 and 200000 standards, for VASS Spain, Serbatic, and Nateevo, as well as those carried out by our majority investors One Equity Partners during 2021.

In this way, we develop a cyclical process, defined according to the strategic objectives of the organization, which begins with the identification of risks from the different departments, managers, work teams and governing bodies; the analysis of impacts and probability of occurrence; decision making for the most appropriate risk management, according to the information available; and the establishment of mechanisms to facilitate ongoing monitoring and evaluation.

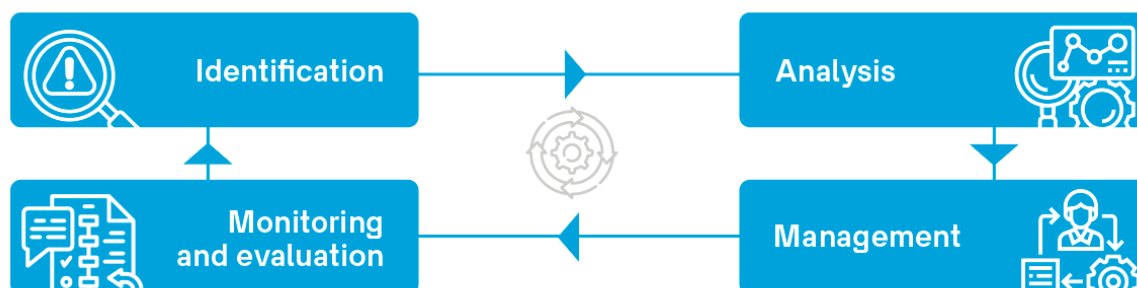


Image 11. Risk management process.

Risk management governance

In order to comply with the risk management process established by the organization, we defined a structure that allows us to respond in a timely, orderly and effective manner to potential situations identified, both internally and externally.

Prevention, mitigation and management actions, as well as the response mechanisms established for each type of risk, are derived from our highest governance body and the Management Committee. This process is led, in turn, by the people responsible for each area of the organization, as an integral part of our mission commitment.

Our risk map

As a result of a thorough analysis of our operations and spheres of influence, we identified the departments and risks most susceptible to occur, related to environmental, social and good governance, and to establish guidelines to facilitate the exercise of preventive, mitigation and management actions, in line with our strategy and value proposition.

Area	Description of risk	Management of risk
Anticorruption and antibribery -ABC-	Cases of corruption or lack of transparency that affect the continuity and reputation of the business.	<i>We have an Ethics Policy, an Anti-Corruption and Anti-Bribery Policy, a Whistle-blower Channel, and training aimed at all personnel.</i>
Information security	Theft or loss of data of any of our stakeholders.	<i>We have an Ethics Policy, a Detailed Information Security Policy, an Information Security Management Policy and a Whistle-blower Channel. We also have management systems certified under the ISO 27001 standard related to information security. We comply with the requirements established by law.</i>
Working conditions	High turnover rate in the sector, and ability to attract and retain talent.	<i>We have an Ethics Policy, Occupational Health and Safety Policy, training and professional development programs, family reconciliation programs (VASS Concilia), and benefit plans.</i>
Diversity and equality of opportunities	Lack of balance in the participation and employment conditions of all people.	<i>We have an Ethics Policy, a policy on harassment at work and for gender issues, a Whistle-blower Channel and an Equality Plan.</i>
Climate change	Impact on the environment from the activities we carry out and the effects on the value chain.	<i>We have an Ethics Policy, Quality and Environmental Policy, Sustainability Policy for Suppliers, and an Environmental Management System certified under ISO 14001.</i>
Financial	Lack of liquidity and possible effects caused by the volatility of foreign exchange rates in our international operations.	<i>We permanently monitor the financial results of our activity from the Steering Committee and financial areas of the organization.</i>
Macroeconomic environment	Changes in regulations and political-economic situations in the countries where we have a presence that affect our operating and financial results.	<i>We permanently monitor financial and environmental changes from the Steering Committee and financial areas of the organization, as well as with the people responsible for operations in each country.</i>

Table 3. Map and risk management.

In response to the risks identified, we implement permanent monitoring and evaluation actions, based on the precautionary principle, in order to strengthen steps that reduce the probability of occurrence and allow us to ensure the stability of the business, the people and the communities in which we have influence.

Due to this, we designed an Ethics Policy, which encompasses issues related to the fight against corruption and bribery: gifts, conflicts of interest and prevention of money laundering; our relationships with third parties, be they governments and authorities, or suppliers and customers; the responsible use of data and new technologies, as well as information security; fair competition and transparency in reporting, auditing and verification of information and, finally, we also address ethical issues in relation to our social performance, respect for human rights, freedom of association and working conditions; and environmental responsibility.

Under this general framework, a series of instruments that aid in the prevention and timely management of risks were created and constitute the roadmap that guides our actions with regards to social responsibility and sustainability criteria.

	Ethics policy Code of conduct
	Anticorruption and antibribery policy
	Detailed information security policy
	Quality and environmental policy
	Information security management policy
	Supplier sustainability policy
	Health and safety policy
	Gender/Work harrassment policy
	Sustainable best practices for suppliers guide

Image 12. Policies that direct our actions.

	Integrated Quality and Environmental Management System ISO 9001/14001*
	Integrated IT Service Management System and Information Security Management System ISO 20000/27001*
	Service Management System ISO 20000**
	Quality Control Management System ISO 9001**
	Information Security Management System ISO 27001**

Image 13. Management instruments.

* VASS Spain, Serbatic and Nateevo, Madrid Office. | ** CRI Group, Luxembourg.

5.9 Rankings and certifications

As part of our commitment to sustainability, we voluntarily participate in the self-assessment of our internal processes and in our relationship with our stakeholders. We seek to identify possible areas for improvement that will enable us to offer a value proposition tailored to our customers' needs, based on the principles of responsible environmental management, respect for human rights, and transparency.



An investor initiative to ensure that the world's largest greenhouse gas emitting companies take the necessary measures to combat climate change. We are participating in this assessment at VASS Spain, with 2021 being our first year. On this occasion, we were placed in Category D and we are already preparing to take action to improve this result in the coming years.



In order to make our customers and partners aware of our sustainability practices and how these are integrated into our business processes, we participated in this evaluation in which we obtained a score of 54/100, which places us above the average of companies in our sector, and thanks to which we obtained the bronze medal. We intend to improve this rating in future years.

In addition, the companies that make up the group have received other recognitions and certifications, as a confirmation of our commitment to quality and value generation, based on social responsibility and sustainability criteria:

VASS Spain

Qualified Partner-Packaged Solution SAP® Customer Experience.

Gold Certified Partner Microsoft.

VASS Spain, Madrid office

CMMI development v2.0 level 3.

VASS Spain, Nateevo and Serbatic, Madrid office

Integrated Quality and Environmental Management System, Standard ISO 9001/140001:2015.

Integrated Services Management System and Information Security Management System, Standard UNE-ISO/IEC 27001:2014 y UNE-ISO/IEC 20000-1:2018.

VASS Colombia

Liferay Partner of the year 2021 Latam.

CRI Group. Luxembourg

Quality Management Systems, Standard ISO 9001:2015.

Service Management System, Standard UNE-ISO/IEC 20000-1:2018.

Information Security Management Systems, Standard UNE-ISO/IEC 27001:2013.

Ecenta

SAP Pinnacle Award winner.

SAP Partnership, incl. required Consultant, Sales and Pre-Sales certifications SAP Recognized Expertise.

6. Materiality

6.1 Methodology

In order to advance in our commitment to responsible management, aligned with the actions set out in the 2030 Agenda and the SDGs, and in compliance with the principles of the Global Compact, we conducted an analysis of the main social, environmental and good governance issues that could be having an impact on our stakeholders as a result of the group's activities.

To this end, we established a process that would allow us to understand the perception of all our stakeholders on these factors, starting during 2020 and incorporating any relevant feedback, with a view to it affecting our activities during 2021.

Using said information we developed the following stages:

1. Stakeholder Identification and Value Chain Analysis

We identify our stakeholders, as well as the risks and impacts derived from our operations, based on an analysis of our value chain.

2. Evaluation and prioritization

We compare the vision of our stakeholders with that of the organization regarding issues related to our management in social, environmental and good governance matters, organised using a criteria of relevance and maturity.

3. Diagnostics

As a result of the consultations carried out, we were able to diagnose the risks and impacts of our activity, and the perception of all stakeholders regarding our management.

4. Materiality analysis

Once the available information has been compared and analysed, we define the relevant aspects that demarcate our roadmap and commitments towards responsible and transparent management with all stakeholders.

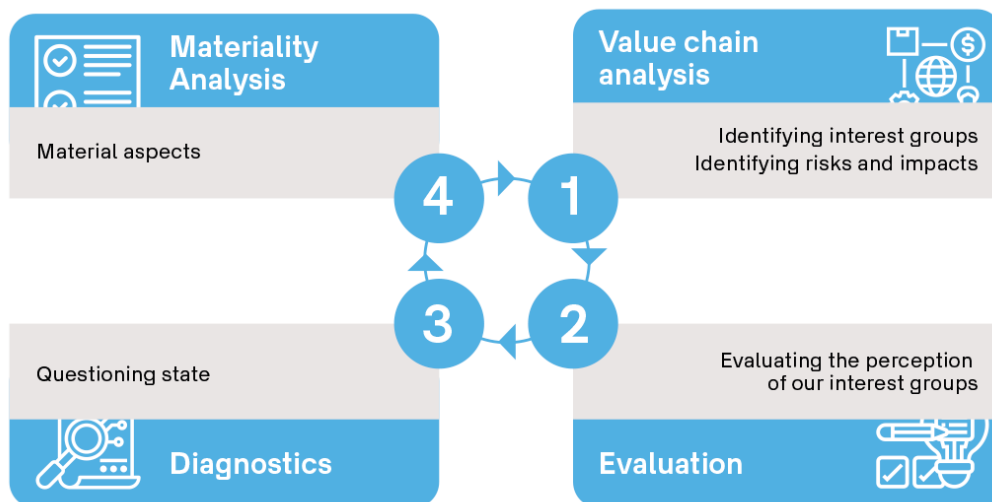


Image 14. Materiality analysis methodology.

6.2 Material aspects

Based on the process developed in the four previous phases and taking as a reference the sectorial elements suggested by international standards such as SASB (Sustainability Accounting Standards Board) and GRI (Global Reporting Initiative), we established a prioritization of the most relevant material aspects, in which the strategic vision of the organization, the identified risks and impacts of our activity, and the perception of our stakeholders are valued.

Once this analysis was completed, we consulted with representatives of our stakeholders on the 15 aspects identified, in order to contrast the importance of these issues for the organizational strategy vs. the importance for the stakeholders.

Dimension	Nº	Material Aspects
Governance	1	Transparency in business practices.
	2	Remuneration, attraction and loyalty of talent policy.
People	3	Family, work and life balance.
	4	Information security.
	5	Health and safety in the workplace.
	6	Gender equality
	7	Diversity
	8	Training and professional development
Society	9	Data confidentiality
	10	Copyright
Environment	11	Environmental impact on carbon footprint
	12	Environmental impact on digital carbon footprint
	13	Disposal of electrical and electronic waste
Economic performance	14	Customer satisfaction
	15	Innovation of solutions and processes

Table 4. Material aspects.

6.3 Materiality matrix

Performing a materiality matrix allows us to visualize those aspects of greatest relevance for the group and for stakeholders, framed within the social, environmental and good governance criteria previously identified. Assessing these issues allows us to develop a responsible strategy, aligned with the needs and expectations of all stakeholders.

Using the comparison made on the material aspects and the perception of relevance for the organization and for our stakeholders, we built the following matrix that will serve as a reference for the preparation of this report, and in the configuration of our future work plans:

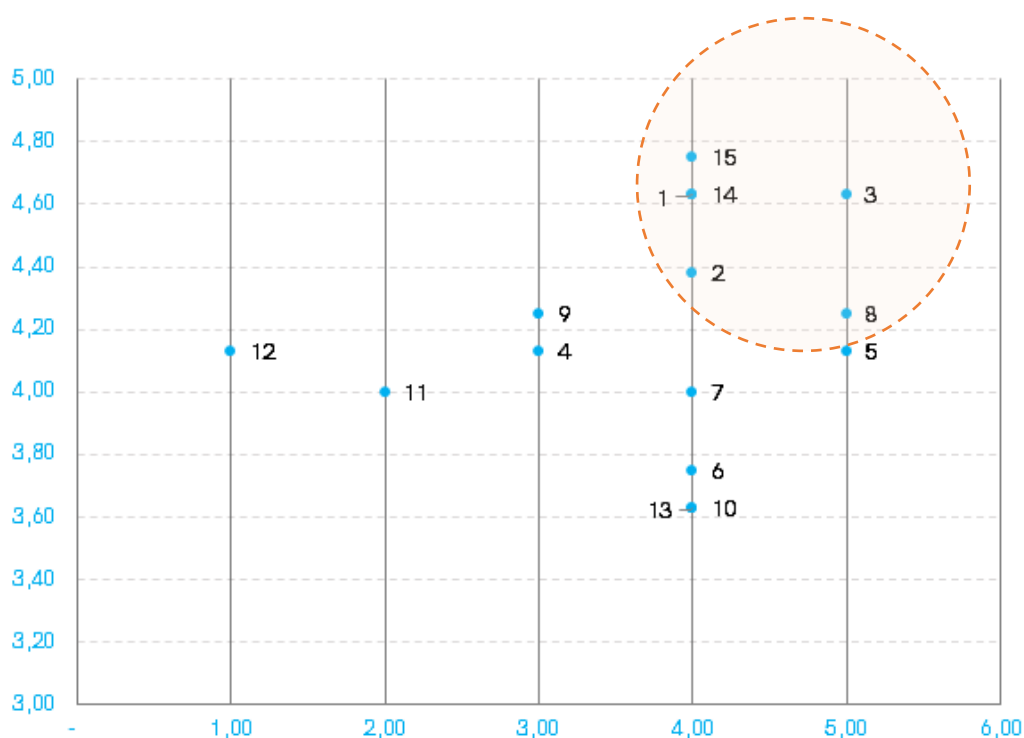


Image 15. Materiality matrix.

6.4 Stakeholders

We seek to generate value propositions that benefit all stakeholders, with a vision of transparency and accountability in management. To this end, we define our stakeholders as all those parties on which our activities, operations and decisions have an impact, whether they are internal or external to the organization.

Our stakeholders are made up of:

- **Clients.** They are our *raison d'être* and our motivation to offer solutions that adapt to the most diverse and demanding needs, wherever we are working.
- **Suppliers.** Fundamental allies in the development of our actions. They are the ones who support, with the quality of their service, our commitment to offer innovative solutions.

- **Talent.** All those people who make up the VASS Group and who, day by day, make the smooth running of the organization possible, thanks to their talent and commitment.
- **Investors.** People and organizations that dedicate their capital to strengthening our capabilities. A relationship of trust and transparency that is constantly being strengthened.
- **Partners.** Those companies that, through their services, allow us to integrate a series of solutions to solve our clients' needs.
- **Society.** Everything we do undoubtedly has an impact on the environment, so we seek to generate growth opportunities in the places where we are present, favouring local employment and sustainable development.

6.5 Channels of communication

We work to generate value for our customers and all our stakeholders, based on transparency and responsibility in which permanent dialogue is a given. For this reason, we design channels and tools that allow us to establish clear, timely, close and assertive communication with all stakeholders, as presented below:

Clients	Suppliers	Talent
Non-financial report	Non-financial report	Non-financial report
Salesforce	GoSupply	Intranet
Whistleblower channel	Whistleblower channel	Mobile App
Website	Website	Whistleblower channel
Social Media	Social Media	Website
Digital communications	Digital communications	Social Media
Telephone assistance	Telephone assistance	Digital communications
		Telephone assistance

Investors	Partners	Society
Non-financial report	Non-financial report	Non-financial report
Monitoring committee	Whistleblower channel	Whistleblower channel
Website	Website	Website
Digital communications	Social Media	Social Media
	Digital communications	Digital communications
	Telephone assistance	Telephone assistance

Image 16. Communication channels with stakeholders.

7. Good Governance

7.1 Transparent and responsible management

Ethics policy Code of conduct
Anticorruption and antibribery policy
Detailed information security policy
Quality and environment policy
Information security management policy
Supplier sustainability policy
Health and safety policy
Work/gender harassment policy
Sustainable good practices for suppliers guide

Image 17. Management instruments.

We base our actions on transparent, careful and responsible business management, which, based on ethical principles of respect for human rights, people and the environment, and on solid and highly qualified corporate governance, allows us to comply with the organization's strategy, generating a safe and trustworthy environment for all our stakeholders.

In order to promote compliance with laws, regulations, contracts, procedures and ethical principles in the actions throughout our organization and the entire value and supply chain, we have an Ethics Policy, which sets out the guidelines that should guide the behaviour of all the people, affiliates, subsidiaries and international offices that make up the VASS Group, as well as agents, consultants and third parties with whom we have a relationship.

We have also developed a series of management tools, using information from the Anti-Bribery and Anti-Corruption (ABC), Harassment Prevention, Information Security, Quality and Environment Policies, based on international standards such as the Universal Declaration of Human Rights, the conventions of the International Labour Organization (ILO), the Convention on Children's Rights, the SA 8000 standard of Social Accountability International, the Basic Policy of the Ethical Trading Initiative (ETI), the Policy on the Conduct of the Electronic Industry, and the draft standards on the responsibility of transnational corporations, Social Accountability International's SA 8000 standard, the Ethical Trading Initiative (ETI) Core Policy, the Electronic Industry Conduct Policy, and the Draft Norms on the Responsibility of Transnational Corporations and Other Business Enterprises with Regard to Human Rights (2003) related to the International Labour Organization's Conventions on Labour Standards.

We also have an Integrated Management System for IT Services and Information Security, certified under the ISO 20000 and 27001 standards, and an Integrated Quality and Environmental Management System, certified under the ISO 9001 and 14001 standards, all of which are applicable to the following companies: VASS Spain, Serbatic and Nateevo, based in Madrid, and a code of conduct applicable to VASS UK.

We understand that the continuous search for excellence, mutual collaboration and the development of lasting relationships based on loyalty and trust are the basis for sustainable business growth. Therefore, we reaffirm our commitment to ethical and responsible management, renewing our adherence to the United Nations Global Compact and our intention to continue contributing to the fulfilment of the Sustainable Development Goals.

As a result of these actions, at the end of 2021 we did not record any fines or sanctions for non-compliance with laws or regulations in social, economic or environmental matters, as well as not facing any legal action, pending or finalized, with respect to unfair competition and violations of applicable legislation on monopolistic practices and against free competition in which it has been identified that the organization may have participated.

In order to continue this process for future years, we intend to strengthen our internal compliance culture and contribute to the development of good management practices in our suppliers, to ensure quality and transparency throughout the supply chain. We also intend to approve the Criminal Compliance Policy, the Criminal Investigation Procedure, the Conflict of Interest Policy and the Donations and Sponsorship Policy.

7.2 Human rights

Our corporate strategy is based on values, principles and social pillars, as set out in our Ethics Policy, in which we declare our willingness and commitment to equality and non-discrimination, respect for people, the prohibition of child labour and forced labour, freedom of association, and the guarantee of fair and reasonable working conditions.

In order to strengthen our management in this area, we have developed mechanisms to prevent harassment at work or for reasons of gender, to protect data and information security, as well as to offer occupational health and safety conditions to all personnel, all of which are included in our policies, applicable to the entire group.

We have also created the Whistle-blower Channel as a tool to facilitate the detection of any situation that violates human rights and to enable us to carry out due process for each infringement identified throughout the value and supply chain and among our stakeholders.

As part of preventive actions, we conducted a total of 1,535 hours of training on human rights policies or procedures and aspects of human rights relevant to operations.

Additionally, in 2021 we renewed our commitment to the United Nations Global Compact, reaffirming, once again, our will to contribute to a fairer and more inclusive society for everyone, in line with the challenges proposed by the 2030 Agenda.

As a group, we work to comply with the provisions of the International Labour Organization conventions, so that there is no risk that the rights of individuals to exercise freedom of association and collective bargaining may be infringed or at significant risk. Likewise, during 2021, we did not receive any complaints regarding human rights violations.

We have also set up the Whistle-blower Channel as a tool to facilitate the detection of any situation that violates human rights and to enable us to carry out a due process.

7.3 Fight against corruption and bribery

We are expressly committed to the fight against fraud, money laundering and corruption in any form, ensuring compliance with current legislation. The prevention of fraudulent or corrupt practices, conflicts of interest and the prevention of money laundering are fundamental aspects of our Ethics Policy.

We will not tolerate inappropriate behaviour related to corruption and/or bribery by or on behalf of our partners, personnel, customers, suppliers or investors. To this end, during 2021 we developed the Anti-Corruption and Anti-Bribery Policy, which establishes the standards that allow us to comply with applicable laws in this area and identify the relevant internal authorities that must participate in the approval and consultation on issues related to this policy.

Aware that prevention is the first step in minimizing risks, in 2021 we approved the Crime Prevention Program, which in turn provides a whistle-blower mechanism, accessible to all our stakeholders, for reporting dishonest acts, corruption, fraud, problems related to human and labour rights, environmental damage or any other unethical behaviour, through the Whistle-blower Channel, available through the intranet or the website.

We also carried out internal awareness training processes for all personnel in order to strengthen the creation of a culture of risk prevention and zero tolerance of corruption and bribery. Thus, 100% of active personnel as of September 2021 had received some form of communication on the organization's anti-corruption policies and procedures. Looking ahead to 2022, we intend to extend the dissemination to the rest of the staff, including the companies that will join the group towards the end of the year.

As a result of these actions, we were able to close 2021 with no reported cases of dishonesty, corruption or money laundering.

→ <https://vasscompany.com/canal-de-denuncias/>

During 2021 we developed the Anti-Corruption and Anti-Bribery Policy, thus establishing the standards that allow us to comply with the applicable laws in this area

Whistle-blower Channel

As part of our commitment to fight corruption, bribery, and any other type of situation contrary to our ethical principles, we created, in 2021, the Whistle-blower Channel, derived from our Crime Prevention Program, approved during the same period.

This mechanism allows us to make progress in the integration of a culture of regulatory prevention within the daily practices of the group, contributing to the creation of a climate of trust, and reinforcing our commitment to responsible and transparent management.

Through this channel, operational since September 2021, people inside and outside the organization can report and inquire about concerns related to any doubt or suspicion that rules or laws have been violated, harassment at work or for reasons of gender, breaches of information security and, in general, any act that undermines integrity.

The Channel is available 24/7 throughout the year and is accessible from the group website and the intranet. The reporting, which can be made anonymously or personally, is analysed by the Whistle-blower Committee, which defines the actions to be taken in each case. The participation of an external lawyer guarantees the confidentiality of any information presented in the report.

During 2021, two cases were registered (one in Spain and one in Mexico) and one inquiry was made (in Spain) through the whistle-blower channel, which were dealt with in a timely manner, following all protocols, and were considered closed after confirming that neither of them was a situation which could be defined as workplace harassment.

As the channel went live, internal informative actions were carried out so that all personnel were aware of this new mechanism and could make use of it if they considered it necessary. During the upcoming period, we will continue to disseminate this whistleblowing mechanism to other stakeholders.

7.4 Information security

We assume a non-negotiable commitment to the responsible use of data and new technologies, as stated in our Ethics Policy. We seek to maintain the confidentiality of the commercial and personal information of our staff, customers, suppliers and investors, using the information to which we have access exclusively for corporate purposes and, under no circumstances, to obtain profit or benefit from it.

To achieve this, we also have a Detailed Information Security Policy and an Information Security Management Policy, applicable to the entire group, which strengthen our action framework, while reaffirming our commitment to compliance with current regulations and the responsible management of any risk of security breach.

We also have the Integrated Management System for IT Services and Information Security ISO 20000/27001, for the following companies: VASS Spain, Nateevo and Serbatic, based in Madrid, and the ISO 27001 Information Security Management System, for the CRI Group, based in Luxembourg.

In addition, we have an Information Security Committee, which reports to the highest governance body and is coordinated by a member of the Management Committee. The Security Committee is the body with the greatest responsibility within the Information Security Management System, so that the most important decisions related to security are agreed by this committee. This is an autonomous, executive body, with autonomy for decision making.

8. People and Talent

More than 2600 stories of talent and growth: one unified team.

Ethics Policy
Quality and environment policy
Detailed information security policy
Information security management policy
Health and safety policy
Work/Gender harrasment policy

Image 18. Management instruments.

People and their talent are what make our work possible, day by day. Therefore, we take steps that allow us to enhance their capabilities and generate favourable conditions for their well-being.

To achieve this, our Ethics Policy establishes the principles that govern our actions in relation to social performance, and where our will to work for equal opportunities and non-discrimination, the prohibition of child labour and forced labour, health, safety and welfare, freedom of association, the guarantee of fair and reasonable working conditions, and dignified and respectful treatment in the application of disciplinary practices is stated.

We have also developed other mechanisms that allow us to strengthen this action framework and that complement our ethical principles, such as the policy against workplace and gender harassment, where we express zero tolerance for any situation regarding harassment, whether sexual or for reasons of gender or moral harassment, harassment at work, gender identity, affective-sexual orientation, pregnancy and paternity / maternity, cyberbullying, and any other discriminatory harassment.

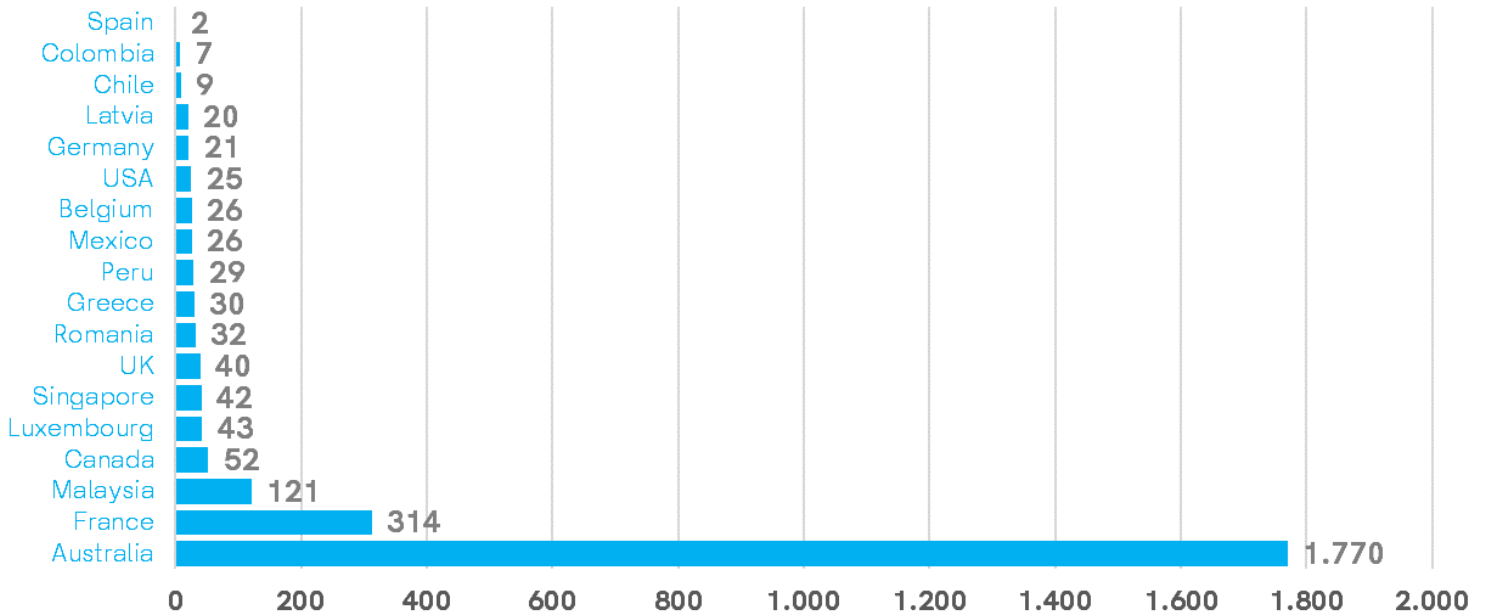
We recognize that it is necessary to work continuously to prevent and avoid any of these situations, so we promote a culture of respect for human rights and the fight against harassment through awareness activities aimed at all staff, and communication mechanisms such as our Whistle-blower Channel, and appropriate organizational structures to facilitate the management of any situation identified, and to generate a good working environment.

We also have a Committee for Intervention in situations of harassment, from which the pertinent investigations are carried out in the event of complaints received, and which is made up of the figure of the Equality Agent, who has the ultimate responsibility for the Committee, People & Talent Management, representation from our own prevention service or prevention representative, representation from the Health and Safety Committee, and Operations Management.

We have also adopted a management model that seeks to ensure the health and safety of all people, and the continuous improvement of safety conditions in all our operation centres, through the dissemination of the Health and Safety Policy.

Providing these guarantees allows us to continue working towards caring for people, strengthening our management to attract and retain talent, and fulfilling our organizational strategy.

Total number of employees by country



Country	Number of People
Spain	1,770
Colombia	314
Chile	121
Latvia	52
Germany	43
USA	42
Belgium	40
Mexico	32
Peru	30
Greece	29
Romania	26
UK	26
Singapore	25
Luxembourg	21
Canada	20
Malaysia	9
France	7
Australia	2
Total	2,609

*100% of companies in the group

8.1 People & Talent

In this department we manage all matters related to personnel within the organisation, their performance and level of satisfaction, based on four workstreams:

Training: responsible for designing and implementing training programs.

VASS Care: where actions related to care, and wellbeing are designed and implemented.

Professional development: responsible for defining functions, job descriptions and career plans.

Labour: responsible for implementing and applying protocols.

We work to generate fair and reasonable working conditions that promote the well-being of all our people and discourage the high turnover that characterizes the sector in which we operate. In general, the average length of service of our personnel is five years.

We believe that such satisfaction is the result of our ongoing commitment to offer continuous learning opportunities, family reconciliation, as well as personal and professional development. We have been recognized as the best ICT consultancy company with Spanish capital, and among the 100 best companies to work for in 2021. *Ranking prepared by Actualidad Económica magazine, from El Mundo newspaper,¹.*

It is important to mention that in the recently acquired companies of T4S, Comunytex, Ecenta and CRI Group, we have initiated a process of standardization of personnel-related issues, such as the equivalence of professional categories and professional development programs and performance evaluations, among others, which will allow us to offer consolidated information on our management as a group.

Remuneration policy

Salary remuneration consists of a fixed remuneration that is generally above the minimum established by law, paid in 12 or 14 payments per year, and which is complemented by variable remuneration and collective benefits, such as health insurance, meal vouchers and leased vehicles, depending on responsibility and professional category. Likewise, and as stated in our Ethics Policy, overtime is paid according to the work and projects performed.

We also offer additional corporate benefits and a flexible compensation plan, in which employees have the possibility of adapting their salary, contracting services such as childcare, restaurants, transportation, training, and health insurance, at a lower value than that offered by the market, which allows the optimization of their income within the legal limitations (<30% of salary).

We also have a salary increase program, depending on the results obtained in their performance evaluation.

Talent attraction and loyalty

We believe in the value of good talent management as a key factor to ensure the creation of united and effective work teams, so we work in several ways to ensure success in attracting personnel and generating loyalty.

¹ <https://vasscompany.com/prensa/vass-mejor-consultora-tic-100-mejores-empresas-trabajar-2021/#:~:text=VASS%20ha%20sido%20valorada%20como,espa%C3%B1olas%20de%20todos%20los%20sectores>

On the one hand, we carry out direct recruitment through the Hiring department, made up of a team of professionals extensively trained in headhunting. We also develop internal campaigns to attract talent, such as the BAF program -Bring a Friend-², in which VASS staff can recommend people they know and get a gift card for it.

These actions are reinforced by processes such as the Winning Candidate Experience, an innovative selection process that we have been implementing since 2017, with which we seek to generate an experience that captivates all participants from the first moment.

In general, our selection processes are based on professional suitability criteria, in which we evaluate candidates according to the requirements identified for each job position.

From the moment they are hired, people are informed about the protocol to follow regarding their career plan and about the different areas of the organization, so that they are aware of the opportunities that exist for internal promotion, both vertically and horizontally. The definition of the objectives to be worked on in the career plans are defined jointly with the employee and are managed through the SuccessFactors platform.

We also take action to promote long lasting relationships and loyalty with our talent, through programs such as VASS Concilia, designed to maximize people's well-being and increase productivity.

Total number and type of contracts

Contract/Workday	Full time	%	Part time	%	Total	%
Permanent	2.524	98%	27	93%	2.551	98%
Temporary	56	2%	2	7%	58	98%
Total	2.580	100%	29	100%	2609	100%

*100% of companies in the group.

Social dialogue and representation

We know that open communication and direct collaboration between personnel and management bodies are the most effective ways to strengthen relationships and find solutions to any situation that may arise.

As stated in our Ethics Policy, the group operates under the premise of respect for human rights, including the right of all people to join unions or any similar representative body, as well as the right to collective bargaining, in accordance with local laws.

In the case of Spanish companies, 100% of individuals are covered under the *Convenio Colectivo Estatal de Empresas de Consultoría y Estudios de Mercado y de la Opinión Pública (Relevant collective bargain agreement)*, dated February 22, 2018.

100% of individuals are covered under the Convenio Colectivo Estatal de Empresas de Consultoría y Estudios de Mercado y de la Opinión Pública (Relevant collective bargain agreement), dated February 22, 2018.

² Applicable to VASS Spain, Nateevo and vdShop.

In the remaining companies, social dialogue with regards to labour relations is framed by the existence of internal regulations in which the rights, duties and obligations of people are established, ensuring dignified, fair, equitable and mutually respectful conditions, harmonizing, in this way, the link between the company and the personnel.

Training and professional development

We understand that continuous learning and capacity building are fundamental elements in the professional development of our people, and that they have a direct impact on their level of motivation and productivity.

For this reason, we design and implement technical and transversal training programs, technical certifications, skills development and language training, all based on the job position and assigned responsibilities.

By the end of 2021, we had carried out a total of 95,623 hours of training.

We also designed a personalized career plan, in which each person sets his or her own pace of professional development. This is a route based on four levels of growth, from junior to senior professionals, which we include in our VASS&YOU program, managed through the SuccessFactors platform.

We allocate an annual budget for training, from where programs are developed, having been previously defined with the collaboration of the People & Talent Training team and the people in charge of each department, according to the priorities and needs of the projects in which each team participates.

*As part of this proposal, we conduct periodic performance evaluations, which seek to identify possible areas for improvement that lead to the development of personal and professional competencies. In 2021, 100% (*without CRI Group) of our people participated in this evaluation exercise.*

Total hours of training, by professional category

Intern		V1		V2		V3		V4		V5		Uncategorized*	
M	F	M	F	M	F	M	F	M	F	M	F	M	F
76	16	9.189	2.631	6.573	3.959	6.270	3.074	11.238	3.118	5.337	1.178	25.695	17.268
83%	17%	78%	22%	62%	38%	67%	33%	78%	22%	82%	18%	60%	40%
Total												95.263	

* Australia, Germany, Belgium, Canada, Spain (Comunyteck), United States, France, Greece, Latvia, Luxembourg, Malaysia, Romania and Singapore. At the end of 2021, the professional categories in these countries/companies have not been standardized.

Working organization

Ensuring the quality of life and well-being of all people is one of our purposes, which is why we work under ethical principles of respect for individuals, favouring the creation of optimal working conditions that take into account all areas of life.

In accordance with the *Convenio Colectivo Estatal de Empresas de Consultoría y Estudios de Mercado y de la Opinión Pública* (Relevant collective bargain agreement), under which Spanish companies are covered, our professional structure is divided into five categories (V1, V2, V3, V4 and V5), a breakdown that is shared with the rest of the group's companies, except for Comuntek, Ecenta and CRI Group, with whom we will begin the system adoption process in 2022, as their integration into our organizational ecosystem took place at the end of 2021.

Number of people employed – by professional category

Professional category	Number of people	%
V1	513	20%
V2	625	24%
V3	531	21%
V4	375	14%
V5	139	5%
* Unclassified	426	16%
Total	2.609	100%

** Australia, Germany, Belgium, Canada, Spain (Comuntek), United States, France, Greece, Latvia, Luxembourg, Malaysia, Romania and Singapore. At the end of 2021, the professional categories in these countries/companies have not been standardized.*

As stated in our Ethics Policy and following the guidelines of the applicable Collective Bargaining Agreement, we establish working hours for people in our offices in Spain (9h-14h and 15h-18h, with one hour for lunch), schedules that may be modified depending on the projects being developed. In these cases, overtime is compensated according to the project and/or the work performed.

In the other companies within the group, schedules may vary depending on the specific context of each country, and the agreements established between staff and area managers, according to the project or service being developed, and respecting, at all times, the rights of all people, and fair and equitable working conditions.

In response to our ethical commitment to promote a balance between personal, family and work life, since 2008 we have been implementing the VASS Concilia program, through which we seek to adjust to workplace realities, as well as to social changes, in order to offer a better quality of life to all people, being even more relevant in after the crisis caused by the pandemic.

VASS Concilia, through which we adapt to workplace realities and changes.

Through this initiative, based on trust between the company and the personnel under the shared philosophy of responsible freedom, a series of measures are deployed around conciliation and other benefits, which are adapted to the realities and contexts in which the different companies of the group are immersed, and which are agreed between the personnel and area managers, complying with current regulations and following the internal regulations of the organization.

In order to continue offering a working environment of well-being and quality, in the coming years we intend to develop a policy related to work disconnection, and to progressively certify our operation centres as family-friendly and healthy companies.

Reconciliation measures

#	Measure	Details
01	Remote working	<i>possibility of working remotely, under a model based on flexibility and mutual trust.</i>
02	Smart working	<i>possibility of working under a hybrid model, combining on-site and distance work.</i>
03	Long-weekend	<i>possibility of taking time off from the workday before a holiday weekend.</i>
04	Part-time work	<i>possibility of modifying the employment contract to become part time, according to the projects and responsibilities assigned.</i>
05	Reduced workday	<i>possibility of reducing the working day to care for dependents up to the second degree of consanguinity.</i>
06	Unpaid leave	<i>possibility of taking up to one month off per year, provided that the person has been associated with the organization for at least one year.</i>
07	Holidays	<i>possibility of extending the time established by the Collective Bargaining Agreement or the legislation in force in each country by up to two additional days.</i>
08	Leave of absence	<i>possibility of requesting this type of leave, whether voluntary, for legal guardianship, or for care of a family member.</i>
09	Moving house	<i>possibility of taking between one and two consecutive calendar days in the event of moving from the habitual place of residence.</i>
10	Preparation for childbirth	<i>possibility of medical examinations and childbirth preparation techniques during working hours.</i>
11	Maternity	<i>possibility of making use of the mandatory rest weeks or of joining part-time, and of immediately enjoying the pending vacations from the current year.</i>
12	Paternity	<i>the possibility of suspending the employment contract, both in full-time and part-time contracts.</i>
13	Breastfeeding	<i>Possibility of being absent from work for one hour a day to breastfeed. Applies to mothers and fathers.</i>
14	Justified absences	<i>The possibility of using leave days for cases of death of family members, accompaniment to medical procedures of minors with a recognized degree of disability, and for the fulfilment of unavoidable duties.</i>
15	Marriage	<i>possibility of enjoying 15 consecutive calendar days holiday, starting from the day of the wedding.</i>

In the upcoming years, we intend to promote the New Talent Experience international mobility program, which had to be suspended due to the pandemic, and with which we seek to promote the exchange of knowledge and cultural diversity among our personnel.

Social Benefits

Flexible remuneration program.

Agreements with universities to access training programs.

Access to the cafeteria located on company premises.

Gift for mothers and fathers on the birth of their children.

Vending machines at reduced prices to allow for the consumption of food and beverages during the workday.

Exclusive prices for the use of the gym.

Health and safety in the workplace

As stated in our Ethics Policy, at VASS group we are concerned about creating a healthy and safe working environment for all people, in accordance with international regulations and national laws.

We base the management of health and safety at work of all our staff on a work culture where prevention and promotion are the first priority and condition of any activity.

For this reason, we implement measures across the different companies of the group that allow us to better manage occupational risks and the necessary preventive planning, in order to minimize and eliminate them.

In the case of VASS Spain, we have a Health and Safety Policy, and an external prevention service and our own prevention service, responsible for ensuring compliance with the general principles of occupational risk prevention in the provision of products and services.

In the rest of the companies in Spain we have an external prevention service, and in those located outside Spain, we have internal personnel, management systems (Colombia and Peru), and training programs to respond to accidents, health problems and foreseeable emergency situations, in line with the legal obligations of each country.

In this regard, it is worth noting that at the end of 2021, we had reported 6 workplace accidents (5 in Spain and 1 in Colombia), no workplace illnesses and no deaths due to accidents in the workplace among our personnel³.

Workplace accidents, number and severity, workplace illnesses - by gender

Spain

Category	Accident requiring time off		Accident not requiring time off		Illness requiring time off		Illness not requiring time off	
	M	F	M	F	M	F	M	F
Workday	0	0	2	1	0	0	0	0
En route	1	0	0	1	0	0	0	0
Total	1	0	2	2	0	0	0	0

* Australia, Germany, Belgium, Canada, Spain (Comunyteck), United States, France, Greece, Latvia, Luxembourg, Malaysia, Romania and Singapore. At the end of 2021, the professional categories in these countries/companies have not been standardized.

³ Not including data related to Covid-19.

Type	Value
Frequency	0,00
Absolute frequency	1,45
Severity	0,00

Colombia

Category	Accident requiring time off		Accident not requiring time off		Illness requiring time off		Illness not requiring time off	
	M	F	M	F	M	F	M	F
Workday	0	1	0	0	0	0	0	0
En route	0	0	0	0	0	0	0	0
Total	0	1	0	0	0	0	0	0

* Australia, Germany, Belgium, Canada, Spain (Comunyteck), United States, France, Greece, Latvia, Luxembourg, Malaysia, Romania and Singapore. At the end of 2021, the professional categories in these countries/companies have not been standardized.

Denomination	Value
Frequency	0,34
Severity	0,00

Diversity and Equal Opportunities

In our commitment to respect for people and the promotion of fair and inclusive treatment, we declare our rejection of any form of discrimination, whether based on ethnicity, ancestry, gender, age, religion, nationality, academic level, political affiliation, disability, marital status, sexual orientation or any other characteristic, as stated in our Ethics Policy.

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Under these principles, we strive to promote the professional growth of our personnel, based on objective and transparent evaluation systems, as well as to prevent all types of sexist practices, as stated in our Policy on the Prevention of Harassment, and the derived protocol on the prevention and action in cases of sexual harassment, thereby promoting the creation of a dignified work environment, respectful of human rights, and one that promotes equal opportunities for all people.

We work towards the goal of the full incorporation of women and a balanced gender presence in the company, through mechanisms such as the Equality Plan, with which we seek to eliminate any obstacles that may exist to achieve this purpose.

Of the total number of people hired in the Group, 27% are women, a higher representation than the average share of women in the ICT specialist sector in Spain, which sits at 20%, according to a study presented by the EU in 2021

Likewise, and aware that people's talent is not determined by their age, physical condition or intellectual capacity, during 2021, 62% of our staff was between 30 and 50 years of age, and there were 10 people with disabilities (9 in Spain and 1 in Germany) adding their talents to the fulfilment of the organization's objectives.

It is worth mentioning that VASS Spain obtained the Certificate of Exceptional performance during 2021, and Nateevo have complied with the Law on Social Integration of the Disabled (LISMI) (Law 13/1982 of April 7), according to which all Spanish companies whose workforce exceeds 50 people, must have a reserved quota in favour of people with disabilities.

Based on our commitment to promote and respect equal opportunities for all people, in future years we intend to permanently measure the salary gap by gender and by professional category, as well as to standardize the selection processes, in line with the guide developed to avoid bias in hiring.

Total number of people employed, by gender

Gender	Number of people	%
Male	1909	73%
Female	700	27%
Total	2.609	100%

**100% of companies in the group*

Total number of people employed, by age

Age	Number of people	%
<30	822	31%
30 - 50	1.614	62%
>50	173	7%
Total	2.609	100%

**100% of companies in the group*

Number of people employed with disability	10
---	----

**100% of companies in the group*

9. Clients

Ethics Policy
Anticorruption and antibribery policy
Detailed information security policy
Quality and environment policy
Information security management policy

Image 19. Management instruments.

We work to offer a wide range of services and solutions in the field of IT, as well as in advisory, consulting and IT services.

We take our value proposition to a 360° level, helping our clients to define and implement innovative business strategies, supported by digital solutions built by the group, or developed in alliance with our partners.

As stated in our Ethics Policy, we strive to generate solutions that meet our clients' needs, maintaining long-lasting and successful relationships based on principles of ethics, transparency and trust.

As with all our stakeholders, the security of our clients is our priority, and for this reason, we reinforce our action framework with service guarantees supported by our quality management, service management and information security systems⁴, which has enabled us to close 2021 with no claims of leaks, theft or loss of customer data.

On our path towards quality and the pursuit of excellence, we reaffirm our commitment to provide solutions that add value and satisfaction to our customers' needs. To this end, we conduct annual surveys, through the specialized Salesforce platform, in order to measure their satisfaction and identify areas for improvement in relation to the products and services offered, in keeping with our goal of continuous improvement.

As a result of the evaluation carried out during 2021, we obtained an average score of 8.17 on a scale of 1 to 10, where 1 is the lowest score and 10 the highest.

⁴ See section "Our risk map".

We also have an established procedure for collecting, analyzing and dealing with our clients' complaints, so that we can manage them appropriately and avoid them happening again. Likewise, all work teams maintain permanent communication channels with our clients, so that any non-conformities that may arise are received and dealt with directly by the personnel responsible for the projects, thus achieving an agile and timely response.

As a result of these actions, we closed the year with no cases of non-compliance with regulations or voluntary codes regarding the impact of our products and services on the health and safety of customers, or related to marketing communications, such as advertising, promotion and sponsorship, resulting in fines or sanctions.

Likewise, during 2021 we started the Whistleblower Channel, which is a communication mechanism for the timely identification of situations contrary to our ethical principles and the law, and about which we will continue to carry out dissemination actions during the upcoming years.

10. Suppliers

Ethics Policy
Anticorruption and antibribery policy
Detailed information security policy
Quality and environment policy
Information security management policy
Supplier sustainability policy
Good sustainable practices for suppliers guide

Image 20. Management instruments.

Based on the principle of responsible and sustainable management, we seek to maintain a relationship of transparency and trust with our suppliers and strategic partners, based on collaborative work and mutual respect.

In this way, we take actions that impact all levels of our supply chain, incorporating tools to improve processes, ensure the quality of our services, and the fulfilment of our obligations, under the unwavering and permanent commitment to respect human rights and the environment.

During 2021, we constituted our Sustainability Policy for Suppliers as another way to materialize our ethical commitment in the purchase of goods and services through standard processes, considering price, quality and performance criteria, as well as their compliance in environmental, ethical, social and information security matters.

We also built the Sustainable Good Practices Guide for Suppliers, which seeks to prevent harassment, promote diversity and gender equality, and respect for human rights, and promote measures in the consumption of materials, energy, water, waste, transportation and communications among all our suppliers; and which complements other management mechanisms such as our Whistle-blower Channel, created during 2021 as a way to identify and address, in a timely manner, any situation contrary to good practices and the law.

In line with our commitment to responsible management, during 2021 we acquired the services of GoSupply, a tool that allows us to monitor and audit our suppliers based on quality and environmental criteria, generating timely information on present and potential risks arising from our entire chain.

Initially, we integrated more than 80% of our suppliers in VASS Spain, Serbatic Spain and Nateevo into this solution, so that we could learn lessons and advance in the process of continuous improvement that will allow us to extend this responsible practice and strengthen the supplier approval processes across all group companies in the coming years, ensuring the quality of our services and our contribution to the sustainable development of communities and the environment.

Through this initiative, and alongside internal monitoring and evaluation actions, in 2021 we found no case of any supplier that generated any current or potential negative environmental or social impact, as well as there being no supplier with a significant risk of presenting cases of child labour or forced labour.

11. Society

Our commitment to sustainable development.

Ethics Policy

Quality and environment policy

Image 21. Management instruments.

In line with our Ethics Policy, we work on the implementation of programs, both our own and in partnership with other entities, that allow us to generate a positive impact and contribute to sustainable social development. We believe that the most vital action is to ensure the health and well-being of our personnel, as well as the quality of our processes throughout the supply chain and in relation to our customers.

As a result of our responsible business management, we have a positive impact on the communities where we operate, generating personal and professional development opportunities for the more than 2,600 people who make up our work team.

In 2007 we began to implement the 1, 2, Action VASS program, upon which our social responsibility actions are built, based on the annual allocation of 2% of pre-tax profit to socially oriented initiatives, and the encouragement of employee participation in corporate volunteering activities, including during working hours.

VASS Foundation

We support and promote digital talent through our Foundation, created in 2019, through which we develop actions in the areas of research, training, innovation and educational cooperation. In this way, we mobilize resources, human and financial, that have a positive impact on the construction of a fairer and more equitable society for all people.

In 2021, we will continue to carry out activities in Spain, across different fields of action and in collaboration with allied entities, as follows:

In the field of research:

We published the III Edition of the Employability and Digital Talent study, and its corresponding Digital Talent Index⁵, in collaboration with the Fundación de la Universidad Autónoma de Madrid. The study involved 57 experts from 46 large companies and 21 Spanish universities, which led to the participation of more than 884 students and 87 teachers.

We continue to publish, on a monthly basis, the ICT Monitor monitoring report (12 issues), in collaboration with the Centre for Economic Forecasts (CEPREDE), which has become a benchmark for monitoring the ICT services sector.

Significant presence in the media (radio, TV, press), through the director of our Foundation.

⁵ https://fundacionvass.org/wp-content/uploads/2020/05/Estudio-de-Talento_-version-Web.pdf

All these actions have had a profound social impact, with a global audience of close to 20 million people and more than 1,000 direct impacts.

In the field of training:

We continued with the technical training programme aimed at people from vulnerable groups, favouring re-skilling and the adoption of digital skills in programming, through the courses of the North American school BOTTEGA.

187 people began their studies in the Fundamentals of Programming course, and 24 more began their studies in the Full Stack Development training programme, managed through initiatives such as the new Municipal School of Digital Talent, linked to the Madrid City Council Employment Agency, and a collaboration programme with the ADECCO Foundation in which we provide technical assistance.

In the field of Innovation:

We continued our support work with the 10 companies that are part of our Innovation Depot entrepreneur assistance programme.

We continued our participation in the Start Up Alcobendas programme, which has allowed us to support eight start-ups by exploring collaboration and pilot experiences.

We developed 15 listening and interaction sessions with 11 different start-ups.

We sponsored the MIT Investors Forum of the MIT Enterprise Forum and participated in the awards ceremony for the best entrepreneurship initiatives.

We conducted prospecting sessions with two start-ups through the Business France programme of the French Embassy in Spain, to help outline valid business solutions for the Spanish market.

In the field of Educational Cooperation:

We maintained the scholarship programme with the Carlos III University of Madrid, paying for one individual to obtain a higher degree in Computer Engineering.

We sponsor the Universidad Politécnica de Madrid's competition on Project Communication.

We signed a partnership agreement with the BEST Association of engineering students, to cover their activities in Madrid, in which 110 people usually take part.

We gave workshops for students from the University of Navarra, the Polytechnic University of Madrid, the Complutense University of Madrid, and the Campus of International Excellence of the Sergio Arboleda University, benefiting nearly 400 students.

We signed a collaboration agreement with the PRODIS Foundation to support the development of a master's degree in Business Service Provision, the first post-university course in Spain, aimed at students with intellectual disabilities.

Other social actions taken as a Group

Spain

BAEe Association: in favour of the integration of students with cognitive disabilities into the labour market.

HabVida Association: support for the development of the Quitamiedos project and the lending of rooms for activities.

The Power of Christmas campaign: support for the reconstruction of the island of La Palma after the volcanic eruption catastrophe.

Down Spain: financial contribution to the development of the Employability Down programme.

GoodJob Foundation: training and recruitment of people with disabilities specialising in cybersecurity issues.

Inclusive Urban Gardens, Merlin Properties: donation of 508.6 kg of food produced in the garden and donated to the Food Bank.

Red Innicia: in the collection of toys and clothes, and the donation of furniture.

Information on partnership or sponsorship:

Alcobendas Council, Spain

Asociación BAEe, Spain

Asociación BEST, Spain

Asociación HabVida, Spain

Centro de Predicciones Económicas (CEPREDE), Spain

Cetecno

Down España, Spain

Enertic.

Escuela Municipal de Talento Digital, Agencia de Empleo del Ayuntamiento de Madrid, Spain

Fundación de la Universidad Autónoma de Madrid, Spain

Fundación PRODIS, Spain

Fundación GoodJob, Spain

Fundación MAPFRE, Spain

Fundación Juan XXIII, Spain

Fundación ADECCO, Spain

Huertos Urbanos Inclusivos, Merlin Properties, Spain

MIT Enterprise Forum, Spain

French Embassy “Business France” Program, Spain

- Red Innicia, Spain
- Universidad Carlos III de Madrid, Spain
- Universidad Complutense de Madrid, Spain
- Universidad de Navarra, Spain
- Universidad Politécnica de Madrid, Spain
- Universidad Sergio Arboleda, Spain

12. Environment

Everything we do leaves a footprint, by making this footprint positive we can guarantee the availability of resources for future generations.

Ethics Policy
Quality and Environmental Policy
Supplier Sustainability Policy
Sustainable good practice guide for suppliers

Graph 22. Management instruments.

Environmental action is featured as one of the group's main action pillars. In order to fulfil our commitment to being a responsible company, we work continuously to align our strategy with the Sustainable Development Goals and the principles of the Global Compact.

To achieve this, we have mechanisms that establish a framework for responsible action, through the definition of the Policy on Ethics in Environmental Performance, the Quality and Environment Policy, and the Sustainable Procurement and Contracting Policy, applicable to all group companies, which contain the necessary guidelines to ensure that all the people who form part of our organisation or who have a relationship with it incorporate good practices into their own management that lead to improving the environmental impact we generate.

In addition, we have an Integrated Quality and Environmental Management System certified under the ISO 14001:2015 Standard in the companies which are based in Madrid. These management systems are subject to an annual internal and external audit, thereby guaranteeing the processes and commitments to continuous improvement, minimisation of environmental impacts, and compliance with the guidelines set out in our environmental policies.

In the rest of the companies in the group we do not yet have a certified environmental management system; however, all of them are clearly committed to protecting the environment, integrating good practices in the management of their activity, and monitoring

for continuous improvement. Nevertheless, in some of the companies we have Environmental Management Plans, as is the case of the VASS subsidiary in Colombia.

All these instruments reinforce our actions, detection, monitoring and evaluation of environmental risks in the different companies within the group.

This has allowed us to close 2021 without sanctions for non-compliance with environmental laws.

Through this process, we seek to transfer the methodology and lessons learned, with the aim of extending these measures to the group's other operation centres in the upcoming years.

We know that impact management begins with identification, which is why by 2022 we aim to obtain carbon footprint certification, initially for the Madrid headquarters.

By measuring the carbon footprint, we also seek to establish a baseline that allows us to implement measures and strategies to reduce emissions and offset them, such as the one we have been implementing in partnership with the Juan XXIII Foundation through Inclusive Urban Gardens, a project that is being developed in the Merlin Properties building in Madrid, which has enabled us to absorb 342.9 kg of CO₂ from the atmosphere during 2021 and generate awareness-raising actions amongst the people from the group who participate on a voluntary basis.

Measures and strategies to reduce emissions and offset them, such as the one we have been implementing in partnership with the Juan XXIII Foundation through Inclusive Urban Gardens, a project that is being developed in the Merlin Properties building in Madrid, which has enabled us to absorb 342.9 kg of CO₂ from the atmosphere during 2021 and generate awareness-raising actions amongst the people from the group who participate on a voluntary basis.

Along these lines, we intend to work hand in hand with the Foundation and allied organisations in order to improve this CO₂ absorption rate in future years.

According to our understanding of the importance of sustainability, we are committed to prevention as an effective measure to reduce the probability of the occurrence of environmental risks. For this reason, we have a civil liability insurance policy with coverage for possible pollution events that may occur in Spain and Andorra, including environmental liability, clean-up, avoidance and prevention costs, civil liability for pollution, employer's civil liability for pollution, defence costs, and the release of expenses.

In addition to this, we have developed awareness-raising actions on sustainability for all personnel, we continue to contract the certified service for the management of hazardous and non-hazardous waste, and hold consultancy days and external audits of our integrated management systems using the company AENOR. We also have a part-time team within the group structure that takes on a large share of the roles and responsibilities related to the leadership of environmental management, mainly focused on those companies certified in the ISO14001 standard.

Finally, it should be noted that, due to the nature of our activity, the main environmental risks and impacts are reflected in energy consumption and associated emissions. We do not generate any emissions of light, noise or ozone-depleting substances that could seriously affect the environment, nor do we generate food waste.

Outreach

VASS Spain, Nateevo, Serbatic, vdShop and T4S operate together in the same facilities based in Madrid, so the use of resources and emissions are calculated together.

VASS Colombia, VASS Peru, VASS Mexico, VASS Chile, VASS UK, Serbatic Mexico, Comuntek, Ecenta and CRI Group operate in third party buildings or coworking centres, where resource use data is generated on an overall basis, and not disaggregated by office.

12.1 Circular economy

The circular economy establishes a more sustainable consumption model that involves the reduction, reuse and recycling of waste. In VASS Group we promote a culture, throughout our chain, oriented towards favouring environmental sustainability through the extended use of products and services, and their appropriate disposal at the end of their cycle.

In our companies, the main materials used are paper, ink and computer equipment. Cardboard and plastic cups are also used, and bottled water is consumed, but priority is given to materials that are suitable for recycling and recovery.

The paper used in the Madrid company offices is FSC (Forest Stewardship Council) certified, ensuring that it comes from sustainable sources, as well as with the European Ecolabel (Ecolabel).

In general, the trend in the way we operate leads to the minimisation of paper consumption, due to the implementation of digitalisation processes and labour flexibility measures such as working from home.

In terms of the waste generated as a result of our activity, we mainly identify paper, plastic, ink, and electrical and electronic equipment.

To ensure proper management, recovery and disposal of both hazardous and non-hazardous waste, we follow all the protocols defined by law in this area, relying for this purpose on the contracting of certified companies, as is the case with the headquarters in Madrid.

We also work hand in hand with our service providers, who work closely with us to achieve responsible management from start to finish.

For example, in VASS Spain, VASS Mexico, VASS Colombia, Nateevo, Serbatic Spain, Serbatic Mexico, vdShop and T4S, we also have agreements with companies that are responsible for the replacement of printer ink.

We ensure proper waste management at our centres, from reduction in the purchase of materials, to proper storage in offices, to the final disposal. However, several of our sites are located in buildings or coworking centres managed by a third party, which makes it difficult to measure waste generated in a disaggregated manner.

For this reason, we intend, in the upcoming years, to improve the measurement of resource consumption and waste generation at our operation centres, and to strengthen awareness of good environmental practices at home, reaching at least 80% of our staff.

Sustainable use of resources

Materials*	Consumption	Unit
Paper	778	Kg
Cardboard	18.000	Vasos
Plastic	471	Vasos
Ink	13	Unidades
	8	kg

* Belgium, Colombia, Chile, Spain (Madrid headquarters), France, Greece, Luxembourg, Mexico, Peru and the United Kingdom.

Waste generated

Materials*	Consumption	Unit
Paper and cardboard	783	Kg
Electric and electronic devices	257	Kg
Plastic	10	Kg

*Spain (Madrid headquarters).

12.2 Sustainable use of resources

Water consumption

In the VASS Group we are aware that water is a valuable resource and that we must use it efficiently. Due to the nature of our activities, water consumption is mainly focused on the use of toilets and cleaning, so we do not generate a significant impact that requires the implementation of special measures. However, at sites such as the one in Madrid, we have sensor-operated taps and double push-buttons in the bathrooms.

In general, the water used at our operation centres comes from the public water supply network. The group's companies generate only sanitary water waste, which is treated by the local sewage networks.

Water consumption

Consumption	Unit
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931

m³

**Spain (Madrid headquarters), Chile and Colombia.*

Energy

We are aware that energy consumption is the environmental aspect upon which we have the greatest impact, especially due to the use of office equipment and the virtual and digital technologies we work with, and, to a lesser extent, the use of lifts and lighting in our operation centres.

The main source of energy used at all our sites is electricity. However, the Madrid offices also use natural gas for heating and have 10 solar panels, owned by the building, to heat hot water during the summer.

Renewable energy sources are used in the Madrid building, where most of our operations are concentrated, and in the building where the ORI company operates in Luxembourg.

We know that we need to gear our management policies towards reducing this consumption. For this reason, we have been working on the implementation of actions to improve energy efficiency, including actions to raise awareness and train staff in the responsible use of resources, and the use of energy-saving light bulbs and LEDs in the Madrid office facilities. Likewise, through our Procurement Policy we establish environmental criteria to ensure that the goods and services we acquire are in line with this purpose.

In order to monitor energy consumption in a timely manner, and to generate information that facilitates decision-making in this area, we undergo exhaustive verification processes, also complying with the Royal Decree 56/2016 in relation to the carrying out of energy audits every four years. Thus, in 2020, we carried out the corresponding energy audit, at the VASS Group headquarters in Madrid.

Energy consumption

Electricity	Unit	Natural Gas	Unit
844.434	kWh	178.583	kWh

**Spain (without Barcelona), Chile, Colombia, Peru, France and Greece.*

**Spain (Madrid headquarters).
**Natural gas is not used in the other offices.*

12.3 Climate change

To achieve the goal of zero emissions in 2050 established in the International Agreement on Climate Change, it is urgent to promote a global transformation in matters such as the production of goods and services, and the creation of new infrastructures at different levels. In this process, companies in the information and communication technologies (ICT) sector, including connectivity, have an important role to play and, at the VASS Group, we have taken on this role.

We are aware that energy consumption can be the main source of greenhouse gases (GHG) and that, due to our activity, this is one of the issues where we generate the greatest impact and, therefore, where we intend to concentrate our efforts.

For this reason, we have been working throughout 2021 on measuring our carbon footprint in Madrid, where the bulk of our operations are concentrated, which will enable us to obtain precise results on the impact we are generating and, in this way, establish the necessary measures to reduce and compensate for any possible effects on the environment. The results of this process will be published, after verification, in 2022.

In line with our commitment to responsible management, we intend to extend this process of measuring and calculating the environmental footprint to the group's other companies over the upcoming years, as well as to define a carbon footprint offsetting plan and strategies to contribute to the goal of generating zero emissions by 2050.

In 2021, we have already achieved some progress in this area, such as a 6% decrease in the electric power requirements at our headquarters in Madrid; we carried out awareness-raising actions on good environmental practices to implement at home, and we incorporated mandatory training programmes for staff on sustainability and the environment.

In 2021, we have already achieved some progress in this area, such as a 6% decrease in the electric power requirements at our headquarters in Madrid

In addition, we made progress in encouraging the acquisition of hybrid cars for all staff with access to vehicle leasing, and five chargers have been installed in the building, thanks to the coordinated management between the VASS Group and the property administrators. Of the 21 new car rentals registered in 2021, 10 were electric.

However, we intend to work on the implementation of the staff mobility plan, encouraging the use of public transport for the daily commute to the workplace, specifically at the Madrid headquarters.

12.4 Biodiversity protection

We know that protecting biodiversity can be key to climate change adaptation and disaster risk reduction. For this reason, all the companies that make up the group are located in urban centres, where we do not affect any protected natural areas or damage the biodiversity of the environment.

Appendices

Employment

Total number of people employed, by country

Country	No. People
Spain	1.770
Colombia	314
Chile	121
Latvia	52
Germany	43
USA	42
Belgium	40
Mexico	32
Peru	30
Greece	29
Romania	26
UK	26
Singapore	25
Luxembourg	21
Canada	20
Malaysia	9
France	7
Australia	2
Total	2.609

*100% of the companies within the group.

Total number of people employed, by sex

Sex	No. People	%
Male	1909	73%
Female	700	27%
Total	2.609	100%

*100% of the companies within the group

Total number of people employed, by age

Age	No. People	%
<30	822	31%
30 - 50	1.614	62%
>50	173	7%
Total	2.609	100%

*100% of the companies within the group

Total number of people employed, by professional category

Category	No. People	%
V1	513	20%
V2	625	24%
V3	531	21%
V4	375	14%
V5	139	5%
* uncategorized	426	16%
Total	2.609	100%

*Australia, Germany, Belgium, Canada, Spain (Comunytec), United States, France, Greece, Latvia, Luxembourg, Malaysia, Romania and Singapore. At the end of 2021, the professional categories in these countries/companies have not standardized.

Total number and type of contract

Contract	Full time	%	Part time	%	Total	%
Permanent	2.524	98%	27	93%	2.551	98%
Temporary	56	2%	2	7%	58	98%
Total	2.580	100%	29	100%	2609	100%

*100% of the companies within the group

Average annual number of permanent contracts, temporary contracts and part-time contracts by gender

Contract	Male	Female
Full time permanent	1394	501
Part time permanent	27	9
Full time temporary	41	16
Part time temporary	-	-

*more than 90% of the companies within the group

Average annual number of permanent contracts, temporary contracts and part-time contracts by professional classification

Contract	V1	V2	V3	V4	V5
Full time permanent	335	513	461	344	126
Part time permanent	3	2	2	2	-
Full time temporary	30	62	6	2	-
Part time temporary	1	-	-	-	-

*Without Australia, Germany, Belgium, Canada, Spain (Comunytec), United States, France, Greece, Latvia, Luxembourg, Malaysia, Romania and Singapore. As of the end of 2021, the professional categories in these countries/companies have not been standardized.

Number of redundancies by sex

Sex	N° redundancies	%
Female	28	25%
Male	83	75%
Total	111	100%

*100% of the companies within the group

Number of redundancies by age

age	N° redundancies	%
<30	42	38%
30 - 50	58	52%
>50	11	10%
Total	111	100%

*100% of the companies within the group

Number of redundancies by professional category

Category	N° redundancies
V1	31
V2	29
V3	19
V4	5
V5	4
* uncategorized	23
Total	111

*Without Australia, Germany, Belgium, Canada, Spain (ComunyteK), United States, France, Greece, Latvia, Luxembourg, Malaysia, Romania and Singapore. As of the end of 2021, the professional categories in these countries/companies have not been standardized.

Average remuneration by sex and salary gap

Sex	Average salary	Salary gap
Male	32.923 €	13,23%
Female	28.567 €	

*more than 90% of the companies within the group.

Average remuneration by age

Age	<30	30 - 50	>50
Male	21.832 €	36.767 €	52.986 €
Female	20.798 €	30.918 €	37.424 €

*more than 90% of the companies within the group.

Average remuneration by professional category

Professional category	Male	Female
V1	16.386 €	16.888 €
V2	24.009 €	22.709 €
V3	35.262 €	32.670 €
V4	45.404 €	40.736 €
V5	75.501 €	61.406 €

**Without Australia, Germany, Belgium, Canada, Spain (Comunytec), United States, France, Greece, Latvia, Luxembourg, Malaysia, Romania and Singapore. As of the end of 2021, the professional categories in these countries/companies have not been standardized.*

The average remuneration of directors and executives, including variable remuneration, allowances, compensation, payment of long-term savings systems and any other payment, by gender.

Level	Male	Female
Board member	214.956,51 €	-
Directors	128.382,03 €	89.009,66 €

Number of hours of absence

Number of people hired with disabilities

N° hours total	117.806	N° people total	10
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*100% of the companies within the group.

*100% of the companies within the group

Health and safety

Workplace accidents, in particular their frequency and severity, as well as occupational illnesses; separated by sex.

Spain

Category	Accident resulting in time off		Accident not resulting in time off		Illness resulting in time off		Illness not resulting in time off	
	Male	Female	Male	Female	Male	Female	Male	Female
Workday	0	0	2	1	0	0	0	0
En route	1	0	0	1	0	0	0	0
Total	1	0	2	2	0	0	0	0

Without Australia, Germany, Belgium, Canada, Spain (Comunytec), United States, France, Greece, Latvia, Luxembourg, Malaysia, Romania and Singapore. As of the end of 2021, the professional categories in these countries/companies have not been standardized.

Denomination	Valor
Frequency	0,00
Absolute frequency	1,45
Severity	0,00

Colombia

Category	Accident resulting in time off		Accident not resulting in time off		Illness resulting in time off		Illness not resulting time off	
	Male	Female	Male	Female	Male	Female	Male	Female
Workday	0	1	0	0	0	0	0	0
En route	0	0	0	0	0	0	0	0
Total	0	1	0	0	0	0	0	0

Without Australia, Germany, Belgium, Canada, Spain (Comunytec), United States, France, Greece, Latvia, Luxembourg, Malaysia, Romania and Singapore. As of the end of 2021, the professional categories in these countries/companies have not been standardized.

Denomination	Index
Frequency	0,34
Severity	0,00

Percentage of employees covered by collective bargaining agreements by country (applies to Spain only)

SPAIN	100%
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Training and Professional Development

Total number of training hours by professional category

Intern		V1		V2		V3		V4		V5		Uncategorized*	
M	F	M	F	M	F	M	F	M	F	M	F	M	F
76	16	9.189	2.631	6.573	3.959	6.270	3.074	11.238	3.118	5.337	1.178	25.695	17.268
83%	17%	78%	22%	62%	38%	67%	33%	78%	22%	82%	18%	60%	40%
											Total	95.263	

*Without Australia, Germany, Belgium, Canada, Spain (Comunyteck), United States, France, Greece, Latvia, Luxembourg, Malaysia, Romania and Singapore. As of the end of 2021, the professional categories in these countries/companies have not been standardized.

Society

Donations to Foundations and Not-for-profit organizations

Fundación VASS	150.000 €
L' Hospital	893 €
Down España	112.794 €
Total	263.687 €

* Ecenta not included

Information on partnership or sponsorship actions

Alcobendas Council, Spain	Fundación MAPFRE, Spain
Asociación BAEe, Spain	Fundación Juan XXIII, Spain
Asociación BEST, Spain	Fundación ADECCO, Spain
Asociación HabVida, Spain	Huertos Urbanos Inclusivos, Merlin Properties, Spain
Centro de Predicciones Económicas (CEPREDE), Spain	MIT Enterprise Forum, Spain
Cetecno	Business France program, French Embassy, Spain
Down España, Spain	Red Inicia, Spain
Enertic.	Universidad Carlos III de Madrid, Spain

Escuela Municipal de Talento Digital,
Agencia de Empleo del Ayuntamiento de
Madrid, Spain

Fundación de la Universidad Autónoma
de Madrid, Spain

Fundación PRODIS, Spain

Fundación GoodJob, Spain

Universidad Complutense de Madrid,
Spain

Universidad de Navarra, Spain

Universidad Politécnica de Madrid, Spain

Universidad Sergio Arboleda, Spain

Environment

Resources dedicated to environmental risk prevention

Action	Investment
Liability insurance	375,41 €
Waste management	6.226 €
External audits	7.000 €
External consultants	9.885 €
Personnel hired	35.103 €
Total	58.589 €

Total hours of activities carried out

Nº total hours	35.103
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**Spain*

Amount of provisions and guarantees for environmental risks

Liability insurance	2.000.000 €
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**Spain*

Water consumption

Consumption	Unit
931	m ³

** Spain (Madrid), Chile and Colombia.*

Energy consumption

Electricity	Unit	Natural Gas	Unit
844.434	kWh	178.583	kWh

** Spain (excluding Barcelona), Chile, Colombia, Peru, France and Greece.*

**Spain (Madrid).
**In the other offices, they do not use natural gas.*

Use of materials

Materials*	Consumption	Unit
Paper	778	Kg
Cardboard	18.000	Cups
Plastic	471	Cups
Ink	13	Units
	8	kg

* Belgium, Colombia, Chile, Spain (Madrid headquarters), France, Greece, Luxembourg, Mexico, Peru and the United Kingdom.

Waste generated

Materials*	Consumption	Unit
Paper and cardboard	783	Kg
Electric and electronic devices	257	Kg
Polluting packaging	10	Kg

* Spain (Madrid).

Calculation of emissions

* VASS Spain, Serbatic Spain, Nateevo and T4S, Madrid headquarters.

Category	Source	Value	Coefficient	Kg CO2 E	Value	Coefficient	CO2
Category 1: Direct GHG emissions and removals	Energy consumption: natural gas heating	178.583,19 kwh	0,18316	32709,296	178.583,19	0,18282	32648,578
	Fuel consumption. Own fleet of vehicles (SOLRED)	Petrol: 38.607,22	Petrol: 2,19352	289944,95	Petrol: 38.607,2	Petrol: 2,17972	286368
		Diesel: 81.700,75	Diesel: 2,51233		Diesel: 81.700,75	Diesel: 2,47507	
		Autogas: 860,03	Autogas: 1,62800		Autogas: 860,03	Autogas: Not apply	
Generator set fuel consumption	25L	2,51233	62,81	25L	2,47507	61,88	
Refrigerant gases from air-conditioning equipment	R410A: 2,4 kg R32: 2 kg	R410: 2088 R32: 675	R410A: 5011,2 R32: 1350	-	-	-	
Total				329.078,256			319.078,458

Category	Source	Value	Coefficient	Kg C02 E	Value	Coefficient	C02
Category 1: Direct GHG emissions and removals	Energy consumption: natural gas heating	178.583,19 kwh	0,00025	44,645	178.583,19	0,00010	17,858
	Fuel consumption. Own fleet of vehicles (SOLRED)	Petrol: 38.607,22 Diesel: 81.700,75 Autogas: 860,03	Petrol: 0,00720 Diesel: 0,00026 Autogas: No aplicado	299,21	Petrol: 38.607,2 Diéeel: 81.700,75 Autogas: 860,03	Petrol: 0,00660 Diesel: 0,03700 Autogas: Not apply	3277,74
	Generator set fuel consumption	25 L	0,00026	0,01	25L	0,03700	0,93
	Refrigerant gases from air-conditioning equipment	-	-	-	-	-	-
Total				343,865			319.078,458

Category	Source	Value	Coefficient	?
Category 2: Indirect GHG emissions caused by imported energy	Energy consumption: electricity	745042	0	0
Category 3: Indirect GHG emissions from transport	Employee travel Private vehicle (petrol, diesel, electric) ▪ Bus ▪ Train ▪ Bicycle...	▪ Petrol 213601853,7 ▪ Diesel 142401235,8 ▪ Hybrid 16439633,1	▪ Petrol 0,17431 ▪ Diesel 0,16843 ▪ Hybrid 0,11952	63182444,2
	Business travel Private vehicle ▪ Bus ▪ Train ▪ Airplane	▪ Airplane: 581273,06 ▪ Train: 11.632,81	▪ Airplane: 0,09708 ▪ Train: 0,03549	56430402
	Emissions from rental cars or hotel stays on business trips.	-	-	-
	Transport consumption for product distribution	-	-	45740,36
	Fuel consumption of suppliers when travelling to facilities	▪ Diesel: 23603	0,16843	3975,45

		-	-	-
Category 4: Indirect GHG emissions caused by products used by the organisation	Waste management	1050	21,294	22358,249
	Drinking water consumption	668	0,149	99532
	Paper consumption	366,22	919,4	336701,3057
	Ink consumption	11	<ul style="list-style-type: none"> ▪ Black 29 ▪ Colour 30,2 	321,4
	Electricity consumption servers	216	0,25	54
	Emissions caused by suppliers of products/services (material, office supplies, minor maintenance visits) mainly due to the use of fuels for travel and the manufacture of the material to be purchased), including the purchase of computers.	-	-	-
Category 5: Indirect GHG emissions associated with the use of the organisation's products	NOT APPLICABLE. The subcategories do not apply, it is a service company, it does not sell products. The services it sells and the emissions that may arise from them are due to the customer's use of them. Likewise, it does not have any leased assets.	-	-	-
Category 6: Indirect GHG emissions from other sources	Consumption of employee computers in remote working mode and at customer sites.	4379,177	0,25	1094,794
	Consumption of electricity, heating, oil... caused by remote working or by employees on customer premises.	-	-	-

Tax information

(*)Locations and Joint Ventures included	Profit/Loss	Taxes on profits paid (unearned)	Grants received	Subsidies	Subsidies	To be returned
OEP AQCUICO	3.532.725,00 €	434.569 €	-	-	-	-
VASS Spain	4.370.890,00 €	1.029.213 €	551.394 €	Eligible loan	110.279 €	441.115 €
Serbatic Spain	363.652,00 €	122.222 €	14.496 €	Operation	-	-
Nateevo	1.011.924,00 €	84.059 €	-	-	-	-
Chile	112.089,40 €	83.580 €	-	-	-	-
Peru	190.740,19 €	104.770 €	-	-	-	-
Mexico	633.592,12 €	157.562 €	-	-	-	-
Colombia	686.454,90 €	469.776 €	8.826 €	-	-	-
United Kingdom	1.155.120,99 €	67.332 €	-	-	-	-
USA	750.392,32 €	-	-	-	-	-
VdShop	(472.689,00 €)	-	-	-	-	-
BENELUX	(130.794,00 €)	-	-	-	-	-
Serbatic Mexico	10.465,27 €	-	-	-	-	-
T4S	(282.249,00 €)	-	-	-	-	-
Comunyttek	633.181,00 €	156.039 €	-	-	-	-
EC. Germany	185.186,88 €	-	-	-	-	-
EC. USA	74.526,63 €	5.232 €	-	-	-	-
EC. Romania	654.040,53 €	89.627 €	-	-	-	-
EC. Canada	147.045,85 €	28.120 €	-	-	-	-
EC. Latvia	2.289.636,85 €	215.200 €	200.000 €	-	-	-
EC. Sweden	(210,91 €)	-	-	-	-	-
EC. Singapore	643.760,83 €	17.710 €	45.268 €	-	-	-
EC. Malaysia	180.769,19 €	75.535 €	-	-	-	-
EC. Australia	36.365,51 €	21.020 €	-	-	-	-
CRI Group	67.619,88 €	4.815 €	-	-	-	-
DIGITERA Group	59.263,36 €	1.605 €	-	-	-	-
CRI LUX	702.399,24 €	5.350 €	-	-	-	-
CRI Belgium	295.459,49 €	25.000 €	4.260 €	-	-	-
DOUBLEIP Greece	196.171,79 €	1.274 €	5.866 €	-	-	-

Materiality

Dimension	N°	Material aspects
Governance	1	Transparency in business practices
	2	Remuneration, attraction and loyalty of talent policy
People	3	Family and work life balance
	4	Information security
	5	Health and safety
	6	Gender equality
	7	Diversity
	8	Training and professional development
Society	9	Data confidentiality
	10	Copyright
Environment	11	Environmental impact on carbon footprint
	12	Environmental impact on digital carbon footprint
	13	Disposal of electric and electronic waste
Economic performance	14	Customer satisfaction
	15	Innovation in solutions and processes

NFR Index

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Markets in which it operates: location of headquarters and location of operations	GRI 102-3, GRI 102-4, 102-6			12; 20-22
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Main factors and trends that may affect its future development	GRI 102-14, GRI 102-15			26-28
Stakeholder analysis: identification and communication channels	GRI 102-40, GRI 102-42, GRI 102-43, GRI 102-21			32-33
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External verification report



CERTIFICADO DE BUENA EJECUCIÓN

Por medio de la presente, dejamos constancia de que la empresa EUROPEAN QUALITY ASSURANCE (EQA) ha desarrollado para nuestra organización la Verificación de los Estados de Información No Financiera según lo dispuesto en el artículo 49 y concordantes del Código de Comercio en su redacción dada por la Ley 11/2018, de 28 de diciembre, por la que se modifica el Código de Comercio, el texto refundido de la Ley de Sociedades de Capital aprobado por el Real Decreto Legislativo 1/2010, de 2 de julio, y la Ley 22/2015, de 20 de julio, de Auditoría de Cuentas, en materia de información no financiera y diversidad.

Los trabajos referidos se llevaron a cabo durante el mes de marzo del año 2022 de forma telemática mediante herramientas TIC.

Cabe resaltar que el trabajo realizado por EQA se desarrolló de acuerdo con los términos de referencia correspondientes y con alto nivel de profesionalidad.

Atentamente,



VASS
VASS CONSULTORÍA DE SISTEMAS S.L.
 Avenida de Europa, 1
 28108 Alcobendas (MADRID)
 C.I.F. B-82422015

FDO. Jeannette Contreras Méndez (nombre, firma y sello)

EMPRESA: VASS Consultoría de Sistemas S.L. (razón social)


Marzo de 2022

Informe de verificación del Estado de Información no Financiera 2021 de VASS CONSULTORÍA DE SISTEMAS, S.L.



- Desfavorable:** Continuar el proceso de verificación en el que se emite una declaración negativa debido al gran número de salvedades encontradas en los Estados de Información No Financiera.
- Denegada:** No emitir una Declaración de Verificación.

Se emite este informe al cliente con fecha de 25 de marzo de 2022:

<p>En nombre de EQA: Verificador Jefe D. Mauro Colomina Soler</p> 	<p>En nombre de la Organización: D. Francisco Javier Latasa</p>  <p>VASS VASS CONSULTORÍA DE SISTEMAS S.L. Avenida de Europa, 1 28108 Alcobendas (MADRID) C.I.F. B-82422015</p>
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Declaración de Verificación Independiente del Estado de Información No Financiera de OEP Spanish IT Acquico S.L.U y sociedades dependientes del ejercicio 2021

Al órgano de administración de OEP Spanish IT Acquico S.L.U y sociedades dependientes (Grupo VASS):

De acuerdo al artículo 49 del Código de Comercio, hemos realizado la verificación, con alcance de seguridad limitada del Estado de Información No Financiera (en adelante EINF) correspondientes al ejercicio anual finalizado el 31 de diciembre de 2021, de OEP Spanish IT Acquico S.L.U (en adelante la Sociedad dominante) y sus sociedades dependientes (en adelante el Grupo VASS) que forma parte del Informe de Gestión consolidado de 2021.

El contenido del Informe de Gestión Consolidado incluye información adicional a la requerida por la normativa mercantil vigente en materia de información no financiera que no ha sido objeto de nuestro trabajo de verificación. En este sentido, nuestro trabajo se ha limitado exclusivamente a la verificación de la información identificada en el Anexo "Tabla de Contenidos EINF" incluida en el Informe de Gestión consolidado adjunto.

Responsabilidad de la Dirección

La Dirección de Grupo VASS es responsable de la preparación, del contenido y de la presentación del EINF, según la Ley 11/2018, de 28 de diciembre. Esta responsabilidad incluye el diseño, la implementación y el seguimiento del control interno que se considere necesario para permitir que el EINF esté libre de incorrección material. El EINF se ha preparado de acuerdo con los contenidos recogidos en la normativa mercantil vigente seleccionados de acuerdo a lo mencionado para cada materia en el Anexo "Tabla de Contenidos EINF", del citado EINF.

Asimismo, la Dirección de Grupo VASS es responsable de definir, implementar, adaptar y mantener los sistemas de gestión de los que se obtiene la información necesaria para la preparación del EINF, así como para el seguimiento del grado de cumplimiento de requisitos exigidos en la Ley 11/2018, de 28 de diciembre.

Independencia y Competencia

El equipo auditor ha cumplido los requerimientos de independencia, imparcialidad y demás exigencias de ética, basando sus actuaciones en los principios fundamentales de integridad, objetividad, competencia y diligencia profesional, confidencialidad y comportamiento profesional.

EQA es un prestador independiente de servicios de verificación tal y como se contempla en la Ley 11/2018.

Nuestra responsabilidad

La responsabilidad de EQA se circunscribe en expresar nuestras conclusiones en una declaración de verificación independiente de seguridad limitada basado en los procedimientos realizados y en las evidencias que se han obtenido. El encargo se ha realizado de acuerdo con una metodología propia, basada a su vez en las mejores prácticas recogidas en la Norma Internacional de Encargos de Aseguramiento 3000 (NIEA 3000 Revisada), "Encargos de Aseguramiento distintos de la Auditoría y de la Revisión de Información Financiera Histórica", emitida por el Consejo de Normas Internacionales de Auditoría y Aseguramiento (IAASB) de la Federación Internacional de Contadores (IFAC), y la Norma Internacional UNE-EN ISO/IEC 17029 "Evaluación de la conformidad. Principios generales y requisitos para los organismos de validación y verificación".

El alcance de un encargo de seguridad limitada es sustancialmente inferior al de un encargo de seguridad razonable y, por lo tanto, la seguridad proporcionada es menor.

Los procedimientos realizados se basan en el juicio profesional de los expertos que han intervenido en el proceso e incluyen consultas, observación de procesos, evaluación de documentación, procedimientos analíticos, y pruebas de revisión por muestreo que, con carácter general, se describen a continuación:



- ✓ Reuniones con el personal de los diversos departamentos de Grupo VASS involucrados para conocer el modelo de negocio, las políticas y los enfoques de gestión aplicados, los principales riesgos relacionados con esas cuestiones y obtener información necesaria para la revisión.
- ✓ Comprobación de los procesos de los que dispone Grupo VASS para determinar cuáles son los aspectos materiales en relación con sus actividades.
- ✓ Análisis de los procedimientos utilizados para recopilar y validar los datos e información presentada en el EINF.
- ✓ Análisis de la adaptación del EINF a lo señalado en Ley 11/2018.
- ✓ Comprobación de datos, en base a la selección de una muestra, y realización de pruebas sustantivas de la información cuantitativa y cualitativa contenida en el EINF del ejercicio 2021.

Conclusiones de la Verificación

Como resultado de los procedimientos que se han realizado y de las evidencias obtenidas no ha llegado a nuestro conocimiento ninguna cuestión que nos lleve a pensar que el EINF de OEP Spanish IT Acquico S.L.U y sus sociedades dependientes correspondiente al ejercicio anual finalizado el 31 de diciembre de 2021, no ha sido preparado, en todos los aspectos materiales, de acuerdo con los contenidos recogidos en la normativa mercantil vigente seleccionados de acuerdo a lo mencionado para cada materia en el Anexo "Tabla de Contenidos EINF", del citado Informe de Gestión consolidado.

Uso y distribución

La presente Declaración de Verificación se emite a la Dirección de Grupo VASS, de acuerdo con los términos del contrato suscrito entre ambas partes.

Esta declaración ha sido preparada en respuesta al requerimiento establecido en la normativa mercantil vigente en España, por lo que podría no ser adecuado para otros propósitos y jurisdicciones.



European Quality Assurance Spain S.L.
D. Ignacio Martínez Cabañero
Director General

31 de marzo de 2022

The logo consists of the word "VASS" in a bold, blue, sans-serif font, centered within a white circle. The circle is set against a solid blue background.

VASS

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