

Code of Ethics



VASS
complex made simple

Confidentiality

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VASS Madrid

CMMI-DEV v2.0 (Staged): Maturity Level, Web Portal Development Projects

UNE-EN ISO 9001:2015 Design, development and implementation of web portals and platforms to support business processes and document management.

UNE-EN ISO 14001:2015 Design, development and implementation of web portals and platforms to support business processes and document management.

UNE-EN ISO 14064-1:2018 The scope of the verification is established for the activities provided by the organisation and managed by the VASS Group: technological consultancy, including the brands VASS, Nateevo, Serbatic, vdSHOP and T4S.

UNE-EN ISO 27001:2017 Business application support service in accordance with the applicability document in force at the date of issue of the certificate.

UNE-EN ISO 20000-1:2018 Business application support service in accordance with the applicability document in force at the date of issue of the certificate.

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Preamble

VASS Consultoría de Sistemas, S.L. (hereinafter referred to interchangeably as “VASS” or “the Organization”) is a Spanish company focused on advising, consultancy and computer services, development, promotion and distribution of its applications (software), as well as the import, sale and distribution of equipment (hardware) and maintenance of said products.

Since 1999, VASS has been firmly committed to the quality of its service and the technological innovation of its products, thus taking care of its greatest asset, the customer.

The Organisation is part of the VASS GROUP, allowing VASS to project its knowledge at an international level.

It is our challenge to continue growing, offering innovative solutions that incorporate new technologies, driven by market needs and achieving all our objectives in an honest and committed manner with the values and principles that have always preceded and will always precede VASS and which are now reflected in this Code of Ethics (hereinafter also referred to as the “Code”).

Message from the CEO

Our Code of Ethics is the expression of our values and our firm commitment to contribute, through our activity, to build a fairer and more transparent environment, in which our ethical and legal behaviour, together with our professionalism and the quality of our services are the basis for the growth of our company.

Good judgement, integrity and the honesty of our team members must be hallmarks of our brand. Therefore, as the company's president, I remain committed to forging a compliance model that demonstrates the values and ways of doing things that have characterized VASS since its creation. This Code of Ethics, as a written expression of our principles, is the cornerstone that underpins this objective - which is further embodied in our compliance policy as a whole.

At VASS, we simply do not tolerate any behaviour that deviates from the highest level of ethical conduct, which is why we demand that our suppliers, customers, partners, and, of course, managers and employees embrace our values and commit to upholding them. We want to be leaders in quality and, also, an example in ethical behaviour, and I am confident that we are well on our way to achieving those goals.

July 2023

Francisco Javier Latasa Vassallo

CEO & Chairman

The importance of the Code of Ethics

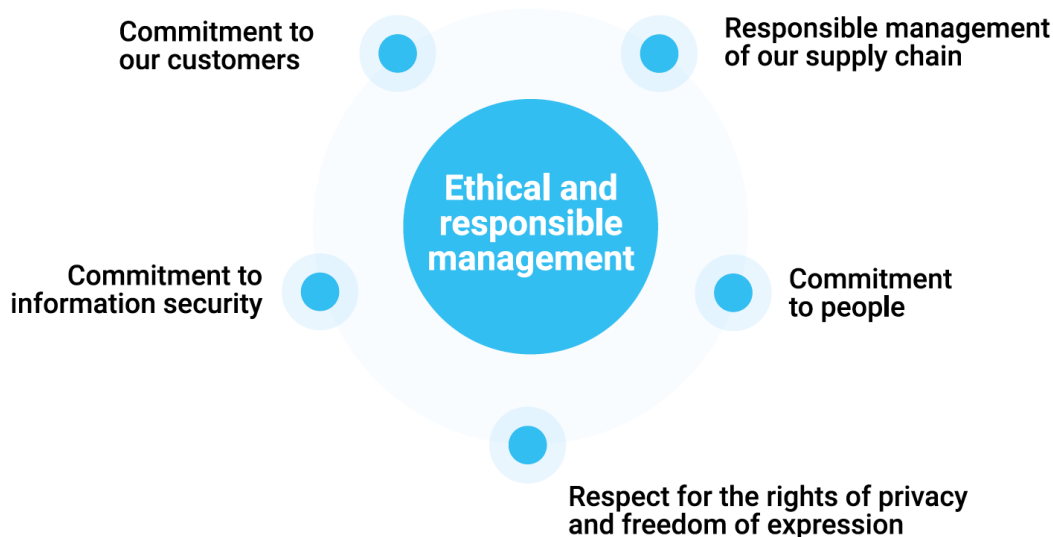
The VASS Code of Ethics is the backbone of our ethical culture, containing fundamental and mandatory rules that aim to establish the principles and corporate ethical values of our organization, with the aim of promoting the highest level of compliance with legal obligations and commitments acquired by the Organization in the exercise of our activities.

The values and ethical principles set out in this Code must be complied with, at all times and without exception, by all members of the Organisation, including workers, managers and the Sole Administrator, regardless of where they carry out their work or activity, the position they occupy within the Organisation or the legal nature of the relationship they establish with VASS.

In addition, VASS requires that its business partners, such as customers, suppliers, and, in general, anyone who maintains a relationship with VASS, adopt conduct in accordance with the principles and values set out in this Code.

Ethical behaviour must be the responsibility of EVERYONE.

VASS principles and ethical values



Commitments

1. Commitment to ethical culture and regulatory compliance

The commitment to the ethical culture of the Organisation is reflected in the daily relations that all VASS professionals maintain with their professional environment, ensuring compliance with the principles and values that govern this Code and other internal and external regulations applicable to the Organisation, as well as through the establishment of mechanisms that ensure compliance with the legislation and regulations in force in the place where they carry out their activity.

Likewise, to achieve this purpose, it is necessary that those business partners and third parties that relate to VASS are also dedicated to the values and principles that nourish the activity of the Organisation - it is not enough that they simply know them, but also that they act according to them.

To achieve the above, VASS provides training to its professionals in order that they become aware of the ethical culture, with the aim of providing them with tools to avoid, detect and manage risks of non-compliance with regulations that could cause economic, legal and reputational damage to VASS.

This commitment to an ethical culture and regulatory compliance is not only the responsibility of the Administrative Body and Senior Management of VASS, who have the mandate to promote and encourage it, but it also depends on each and every one of our employees, who, when taking their professional decisions, act in the name of the Organisation.

2. Protection of confidential information, industrial and intellectual property, and personal data

Confidential information and knowledge - both our own and those of third parties, as well as personal data - are an important asset for any organisation, as well as for VASS. For this reason, the organisation is committed to their protection by complying with the applicable laws in this area and implementing appropriate technical protection measures.

Confidential information is understood as information that is not in the public domain, i.e., Access to such information is restricted to a certain number of people, which has a competitive or market value and for which VASS has adopted protective measures appropriate to its nature to prevent unauthorised access, dissemination or disclosure.

Likewise, it is essential that anyone who has access to confidential information belonging to VASS, respects the duty of confidentiality, since any disclosure could involve negative consequences for the interests of the Organisation.

Therefore, VASS expressly prohibits the use, disclosure, dissemination, or transfer, without the authorisation of its owner, except in legally permitted cases, of any type of information considered confidential or specific knowledge in any format, even verbal, whether it belongs to VASS or to a third party.

Examples of confidential information of VASS or a third party

- Strategies.
- Innovation and development plans.
- Working procedures or methodologies.

3. Zero tolerance for corruption

Corrupt practices, both in the public and private sectors, harm free competition and the development of markets, increase the cost of goods, introduce uncertainty in commercial transactions, and diminish the quality of products and services, destroying confidence in the correct and efficient functioning of markets, amongst other things.

For all these reasons, and the negative consequences that can result from the carrying out of a corrupt act within the Organisation, VASS undertakes at all times to act in accordance with the principle of zero tolerance towards crime and corruption, expressly rejecting and condemning all types of bribery and influence peddling, as well as any other type of practice considered corrupt or fraudulent.

To this end, the Organisation undertakes to comply with the highest ethical standards, as well as the internal or external laws and regulations applicable to the activities it conducts, regardless of the place where they are carried out.

VASS expressly prohibits any conduct that consists of offering, promising, delivering, requesting, receiving and/or accepting, for the benefit of the Organisation or third parties, cash payments, gifts, commissions or any undue advantage or compensation, in order to bribe public officials or authorities, or that has the purpose of unduly favouring another in the acquisition or sale of goods, contracting of services or in commercial relations, whether natural or legal persons, of a public or private nature.

VASS does not make any financial or benefits contributions to politicians, political parties, lobby groups and the like. In the event that charitable donations are made, such as to publicly recognised NGOs, the donation must be authorised by management and will be disclosed both internally and publicly.

Example of corruption

As part of a selection process for a new supplier, a VASS member promises one of the suppliers participating in the process that he or she will be hired. In return, the supplier will employ the son/daughter of the VASS member in his organisation.

4. Managing conflicts of interest

When taking any decision in the development of our professional activities, private interests may cause us to stop acting legally, objectively, transparently, and loyally towards VASS, and personal interests may come into conflict with those of the Organisation.

At VASS, we consider it essential to avoid any situation of conflict of interest, since, otherwise, such a situation could lead to a loss of objectivity in decision-making, with the risk that this could lead to corrupt or fraudulent practices.

To this end, the Organisation undertakes to comply with the highest ethical standards, as well as the internal or external laws and regulations applicable to the activities it conducts, regardless of the place where they are carried out.

VASS expressly prohibits any conduct that consists of offering, promising, delivering, requesting, receiving and/or accepting, for the benefit of the Organisation or third parties, cash payments, gifts, commissions or any undue advantage or compensation, in order to bribe public officials or authorities, or that has the purpose of unduly favouring another in the acquisition or sale of goods, contracting of services or in commercial relations, whether natural or legal persons, of a public or private nature.

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For this reason, the principle of action in the event of a conflict of interest is, prior to taking any decision, to immediately notify VASS of the situation, refraining from taking any decision in relation to the activity notified.

Example of conflict of interest

When deciding on the selection of a new supplier, if there is a possible family or friendly relationship, this should be disclosed, and the supplier should abstain from participating in the decision. Our processes are based on objective, technical and merit-based criteria.

5. Market competition

As a tangible sign of integrity and ethics, and in order to promote fair play in the market, VASS considers as an essential value, effective, loyal and fair competition in all its commercial relations with third parties and in its interaction with the market in general.

Consequently, it rejects any unlawful conduct contrary to fair competition, contrary to good faith and which could entail any type of restriction to competition law by persons linked to the Organisation in their commercial relations with third party agents.

Non-compliance with Antitrust Laws may cause serious damage to the Organisation and to the market in general, as well as the destruction of corporate reputation.

Examples of an anti-competitive practice

- Direct or indirect price fixing with competitors.
- Sharing of markets or sources of supply.
- Application, in commercial relations, of dissimilar conditions for equivalent services which place some competitors at a disadvantage vis-à-vis others.

6. Commitment to our customers and to society

At VASS, our customers are our main asset and for this reason we guarantee the quality and safety of the products and services we offer. At the same time, we are rigorous in their protection and compliance with applicable legislation.

Respect, professional responsibility, transparency and honesty are at the forefront of our commercial relations with our customers.

Our track record endorses us as a company that promotes technological innovation, talent and variety as basic requirements to satisfy the wishes of our customers, with the aim of continuing to grow in response to new market needs.

On the other hand, we are committed to society and therefore we focus on the development of actions in the fields of research, training, innovation, and educational cooperation through the VASS Foundation.

7. Relations with our business partners and third parties

VASS considers its business partners and third parties as indispensable in the achievement of its objectives of growth and improvement of the quality of service, seeking to establish business relationships with them based on respect and mutual trust.

VASS is therefore committed to implementing procedures for selecting, approving and monitoring the quality of its business partners based on criteria of objectivity, avoiding at all times any conflict of interest in their selection or undue favourable treatment.

The Organisation is governed by the principles of professional responsibility, impartiality, honesty and transparency, advertising and promoting its services in a true and truthful manner, not tolerating fraudulent practices such as misleading advertising.

Business freedom and objectivity are essential components of a good ethical business culture.

8. Respect for our professionals

VASS, in its relations with professionals promotes diversity and dignified treatment; we do not tolerate differences in treatment or discrimination based on age, sex, ideology, race or religion; nor any manifestation with connotations of harassment or abuse of authority.

We promote equal opportunities and both personal and professional development, taking into account criteria of merit, aptitude and capacity in the selection and promotion processes for personnel, with maximum transparency and objectivity.

We are committed to balancing work and family life, and we comply with health and safety at work regulations, training our professionals and adopting the legally required prevention measures.

Our professionals have at their disposal all the tangible or intangible goods and assets necessary for the development of their activity, expecting them to be used professionally, lawfully and responsibly, and the use of these assets for the commission of fraud or illegal activities of any kind and in any form is strictly forbidden.

9. Human rights and civil liberties

VASS, in order to ensure the ethical and social behaviour of its activity, undertakes to respect the Ten Principles of the United Nations Global Compact, taking responsibility, on the one hand, to support and respect the protection of internationally proclaimed Human Rights and, on the other, to take measures to ensure that it is not complicit in any violation of Human Rights.

10. Respect for the Environment

Acting in favour of the environment is incorporated as one of the fundamental action pillars of VASS. In order to fulfil the commitment to be a responsible company, we work continuously so that our strategy is aligned with the Sustainable Development Goals and the Principles of the Global Compact.

VASS carries out its activity committed to the environment, firmly respecting the protection, conservation and improvement of the environment, with the aim of guaranteeing future generations a sustainable planet.

For all the above reasons, VASS:

- Implements favourable preventive measures that contribute to the above-mentioned objective through, for example, the adoption of an environmental management system in accordance with international standards.
- Encourages initiatives that promote greater environmental responsibility.
- Encourages the development and diffusion of environmentally friendly technologies.

All activities conducted by VASS comply at all times with the applicable environmental regulations.

Ethics and Consultation Channel

In order to encourage the development of the compliance culture in the Organisation, VASS provides a communication channel for both members of the Organisation and third parties to communicate any doubt, conflict, indication of irregularity, illicit or criminal offence, non-compliance or risk of non-compliance related to this Code of Ethics and/or the internal regulations that develop or complement it.

All communication made through this channel will be received and managed diligently and respectfully by the Compliance Officer, acting at all times in accordance with the internal procedure established for this purpose, as well as in accordance with the existing internal and external regulations in this area.

VASS strictly guarantees the confidentiality of communications received in good faith and based on reasonable indications, prohibits any type of retaliation, as well as upholding respect for the regulations on personal data.

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The channels of communication provided by VASS are:

- compliancegrupovass@vasscompany.com
- <https://channel.globalsuitesolutions.com/vass>

However, the Compliance Officer may also be contacted by telephone (+34610274575), through face-to-face meetings or by any other means of communication provided for this purpose.

Any infringement or breach of this Code of Ethics and the regulations that develop it may lead to the opening of disciplinary proceedings and even, depending on the seriousness of the facts investigated, to the application of the sanctioning regime established in the statute of workers and agreements applicable to VASS.