



CODE OF ETHICS AND CONDUCT

ADEVEX SOLUCIONES, S.L.

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01. INTRODUCTION

Commitment to ethics is an essential pillar for the proper functioning of Adevex. This Code of Ethics and Conduct formalizes Adevex's commitment to ethics and is the fundamental standard that binds us to our customers, suppliers, and any third party that has a relationship with us and whose opinions and decisions influence our financial results or impact our reputation.

This Code sets out and exemplifies the way in which all of us at Adevex act, establishing our firm commitment to act with the utmost transparency and honesty in order to build trust in our relationships with third parties, as we consider it very important to conduct our business activities in a responsible manner and to generate value for society.

The rules set out in this Code are designed to protect the integrity of Adevex and ensure compliance with laws and regulations wherever the company operates, reflecting its commitment to sustainability and good governance.

This Code of Ethics and Conduct is not a substitute for the legal regulations that apply in each case or for the obligations validly assumed through contract or collective bargaining.

02. MESSAGE FROM THE CEO

At this initial stage of our company's growth, we believe that now is the right time to lay the foundations for a responsible organization that is committed to people and their environment. From the outset of our activity, we want to take care of those who are part of our project—employees, customers, and suppliers—and build relationships based on trust and respect.

That is why we are promoting the implementation of our Code of Ethics and Conduct, which sets out the principles and values we consider essential, such as respect for human rights, equal opportunities, and a commitment to concrete actions aimed at conserving and improving the environment. This Code will guide our actions and the sustainable development of the company from its very first steps.

03. OBJECTIVE, SCOPE, AND APPLICABLE PARTIES

The objective of this Code is to provide a code of ethics for all of us who are part of Adevex, so that we are aware of Adevex's ethical values and the guidelines for conduct and criteria for action to be followed in our professional activity in order to promote a culture of ethics and compliance within our company.

Conduct that violates these rules will not be consistent with Adevex's way of acting, and violation of this Code will result in disciplinary action or termination of employment for the person who violates it.

The aim is not to cover all possible situations that may arise in the professional sphere, but rather to establish minimum standards of conduct that should guide us in our actions during the course of our professional activity.

This Code is intended for all professionals who make up Adevox, so that they can understand what is expected of them and what their responsibility is in applying the company's values. It is also intended for the leaders of our company, to help them in their decision-making and to make them aware of their responsibilities. It is also intended for customers, suppliers, and other people who interact with us, to help them understand our organization.

04. RESPONSIBILITIES

The Board of Directors is responsible for approving the Code, thus representing its commitment to Adevox's compliance and ethics system.

Adevox employees have the following responsibilities:

- To be familiar with the Code and act in accordance with the values, principles, and guidelines for conduct contained therein.
- Collaborate with other members of the company so that they can conduct themselves in accordance with the ethical values, principles, and guidelines for conduct set forth in the Code.
- Promote the ethical culture and values set out in the Code by example in the performance of their duties and responsibilities.
- Actively participate in training and awareness-raising activities to promote ethics and compliance.
- Report any breach of the Code and applicable legislation.
- Consult any questions that may arise regarding the application of the Code.
- Make responsible use of the Whistleblower Channel in accordance with the principle of good faith.
- Actively and loyally collaborate in the development of investigation and consultation files derived from the Code.

05. OUR VALUES AND ETHICAL PRINCIPLES

Our values and principles are based on integrity, excellence, trust, transparency, and sustainability.

These basic principles of action must constitute a mandatory guide to ethical business conduct for persons included in the scope of application of the Code.

5.1. Compliance with the law

- **Prevention of corruption:** AdeveX is committed to strict compliance with the legislation in force in each of the places where it operates, with zero tolerance for corruption, as this prevents serious social, reputational, and economic damage to our company, the people who make it up, and society as a whole.

Therefore, we are expected to:

- to avoid any conduct that could be interpreted as deceiving our stakeholders or that could affect the impartiality and objectivity of third parties with whom we interact;
- be aware of the activities of third parties with whom we have business relationships to ensure that they also reject corruption;
- ensure that the services they provide to us are legal;
- avoid making payments where the amount, recipient, and purpose are not clearly justified;
- avoid any activity that could raise suspicion of being related to corruption;
- not accept or give gifts, loans, favors, or compensation from customers, suppliers, or third parties, except for gifts of negligible value that are customary courtesies.

- **Prevention of money laundering:** AdeveX rejects any practice that is known to be linked to money laundering, terrorist financing, or any other criminal activity.

Therefore, we are expected to:

- verify the identity of the individuals and companies with whom we sign agreements;
- exercise special caution in transactions involving companies where it is not possible to identify the partner or owner;
- not accept payments not agreed in the contract, or using cash payments or bearer checks or through accounts in tax havens.

- **Fiscal responsibility:** AdeveX is committed to complying with its tax obligations, acting transparently and proactively and cooperating with public administrations to fulfill its legal obligations.

Therefore, we are expected to:

- the information we provide to the tax authorities is accurate, specific, and timely;

- we act prudently when making decisions that may generate a tax risk.

5.2. Integrity and objectivity

- **Transparency in the management of our interests:** Adevox is committed to establishing impeccable relationships based on transparency, loyalty, and respect for all third parties with whom we interact in our activities.

Therefore, we are expected to:

- the information we provide is accurate;
- we preserve the confidential information to which we have access and avoid sharing information with third parties, especially with competitors of the owner of such information.
- we act transparently in tenders, without taking any action that could be interpreted as an attempt to manipulate the outcome;
- ensure that we treat our suppliers with transparency and equal treatment;
- we leave any meeting with other organizations where topics are discussed that could lead to the manipulation of market prices for products and services;
- avoid making misleading statements about third parties that could damage their reputation.

- **Continuous improvement of our services:** Adevox is committed to a process of continuous improvement of our services, in order to provide our customers with the highest quality services that meet their expectations and foster a relationship of trust and mutual benefit.

Therefore, we are expected to:

- provide the highest quality services that meet our customers' demands;
- act in a manner that promotes mutual trust and transparency;
- manage and resolve our clients' queries and complaints quickly and effectively;
- avoid conflicts of interest in our business relationships with our customers;
- not conceal relevant information from our customers in relation to the services we provide;
- avoid using irregular commercial practices to obtain customers or to influence their impartiality in evaluating our services.

- **Responsible relationships with our suppliers:** Adevox considers its suppliers and subcontractors to be very important elements in the development of its activity, which is why it promotes relationships with them based on principles such as non-discrimination, equal treatment, mutual recognition, proportionality, and

transparency.

Therefore, we are expected to:

- act objectively, transparently, and impartially in the procurement of goods and/or services;
- maintain impeccable behavior in our interactions with them;
- develop clear and accurate communication with suppliers, avoiding potential conflicts;
- avoid conflicts of interest;
- not manipulate, conceal, or misuse privileged or confidential information that we may obtain in our relationship with suppliers;
- not conceal or cover up any suspicion of corruption, bribery, or other illegal behavior on the part of the supplier.

5.3. Respect for people

- **Respect for workers and their rights:** Adevox is committed to preventing child labor and eliminating forced or compulsory labor, opposing any practice that involves discrimination in employment or a violation of the privacy of its employees and their families. Likewise, Adevox guarantees freedom of association, the right of association, and collective bargaining for its workers, as well as equal opportunities. Therefore, we are expected to:

- participate in the organization's initiatives for the development of labor rights and the creation of stable, quality employment, creating a climate that promotes understanding;
- get involved in training and awareness-raising activities promoted by the organization;
- not allow discrimination based on ethnic or cultural origin, disability, nationality, gender, sexual orientation, religion, age, social origin, ideology, etc.;
- refrain from behavior that could constitute moral or sexual harassment;
- not tolerate breaches by our business partners, suppliers, or customers in relation to fundamental labor rights or any form of child labor.

- **Occupational health, safety, and well-being:** Adevox seeks to provide its employees with measures that promote a balance between their personal and professional projects, favoring work-life balance. Adevox is committed to implementing best practices in occupational safety, maintaining a culture of zero tolerance for non-compliance with occupational risk prevention regulations.

Therefore, we are expected to:

- participate in the organization's initiatives to promote employee health and create a work environment that balances professional commitments with personal development;
- participate in training and awareness-raising activities promoted by the organization;
- support continuous improvement in safety, health, and well-being in accordance with applicable regulations, completing training for the performance of job-related activities, and using the necessary work equipment and resources to perform work in safe conditions;
- not work under the influence of alcohol, drugs, or any other substance that may affect professional behavior and judgment;
- promote compliance by our suppliers with occupational health and safety standards and procedures.

- **Respect for diversity:** AdeveX is committed to promoting a work environment based on respect, diversity, and equality, free from discrimination and eliminating barriers related to gender, experience, knowledge, age, etc.

Therefore, we are expected to:

- foster an environment of respect and tolerance, encouraging collaboration and freedom of expression;
- avoid arbitrariness, exercising our responsibilities in a fair and equitable manner and respecting people's dignity;
- avoid any behavior that may go against gender equality and respect for other groups such as the LGTBI community;
- facilitate the integration and professional development of colleagues with disabilities.

5.4. Quality and safety

- **Protection of information and personal data:** AdeveX is committed to the secure and responsible management of the information to which it has access, ensuring its confidentiality and ensuring that it is only accessible to authorized persons.

Therefore, we are expected to:

- sign confidentiality agreements for projects that require the use of confidential information;
- take measures to protect confidential information to which we have access, whether it belongs to Adevox or other companies;
- respect the security measures established to ensure the protection of information and personal data;
- report any incident that affects the security of the information and personal data processed by the organization;
- respect the personal and family privacy of all persons whose personal data we have access to;
- not use confidential information for personal gain or for the benefit of third parties;
- we do not retain or use Adevox information once the employment relationship has ended.

- **Dissemination of information:** Adevox is committed to the principles of clarity, transparency, and truthfulness, disseminating clear, truthful, complete, adequate, and accurate information about our management.

Therefore, we are expected to:

- provide truthful, clear, and timely information, taking into account the protection of confidential information and personal data to which we have access;
- not hide or falsify data, entries, accounting operations, or obligations incurred by Adevox;
- not destroy, alter, or conceal documents in anticipation of or as a result of audit procedures or investigations;
- not engage in or collaborate with illegal activities to defraud the legitimate rights of third parties.

- **Protection and responsible use of assets:** Adevox's assets are a fundamental element in achieving its business objectives. Therefore, it is essential to use all of the organization's assets (facilities, equipment, financial resources, intellectual property, etc.) appropriately, responsibly, and effectively, and to maintain the organization's good name at all times, as Adevox considers its image and reputation to be one of its most valuable assets.

Therefore, we are expected to:

- use the organization's assets in a lawful, prudent, and responsible manner and protect them from theft, loss, damage, or unauthorized use.
- protect data and information systems by using passwords that safeguard assets, without providing them for use by other people;
- not install or use applications on computers without proper authorization;
- maintain a work environment in a proper state of care and security;
- protect the industrial and intellectual property of AdeveX and third parties;
- not use the AdeveX logo to express personal opinions, open accounts on the internet, or register on forums and social networks without authorization.

5.5. Environmental protection

- **Conservation and improvement of the environment:** AdeveX is committed to protecting and improving the environment by minimizing the undesirable effects of its activity.

Therefore, we are expected to:

- be aware of and comply with the legal and voluntary environmental requirements adopted by the organization to reduce our carbon footprint and help combat climate change;
 - participate in all initiatives proposed by the organization to minimize waste and be more efficient in the use of natural resources such as raw materials and energy;
 - minimize and, as far as possible, avoid the impact of our activity on the ecosystem, especially in terms of waste production, noise, odors, and light pollution;
 - Employees will be trained, informed, and made aware of environmental protection issues;
 - Resources will be used efficiently, minimizing waste production;
 - Environmental protection and sustainable consumption will be promoted.
- **Human rights:** We are firmly committed to all human rights, especially those related to professional activity, childhood and youth, equal opportunities, and non-discrimination.

06. SPECIFIC POLICIES ON VARIOUS MATTERS

At Adevox, we have specific documents relating to different policies of the organization:

- Conflict of Interest Prevention Policy
- Anti-Corruption Policy
- Gifts and Entertainment Policy
- Information Security Policy

07. ENTRY INTO FORCE

This Code came into force on February 27, 2026.

The Code will be reviewed periodically in order to adjust its requirements to the reality of Adevox.