



## **CODE OF CONDUCT AND GOOD CORPORATE PRACTICE**

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## **CODE OF CONDUCT AND GOOD CORPORATE PRACTICES**

### **1. INTRODUCTION**

For decades, Grupo IO has been helping our client companies to plan their activities and make decisions in a more efficient and contrasted way. Our experience and expertise have made us a benchmark organization in the market research sector and we work every day to consolidate and improve this position. In this process of constant improvement we have implemented a Regulatory Compliance Program ("Program"), of which this Code of Conduct and Good Corporate Practices ("Code") is the centerpiece and through which we want to formalize our commitment to what we are and what we want to continue to be in the future.

The Code contains the corporate values and ethical framework that guide the development of our professional practice. We want them to be present at all levels and decision-making processes of the organization, internally and when we relate to third parties, and to be translated into concrete behaviors in our daily professional life.

Its approval has the impetus and firm support of the Board of Directors and consolidates the culture of compliance in the Group and the prevention of possible irregular or improper conduct that could jeopardize our interests or our reputation. The Code has been conceived as an evolving document, within the reach of all persons subject to its contents, and open to their participation through the communication channels it enables.

### **2. OBJECTIVES**

The approval of this Code is intended to:

1. Establish the framework that supports our compliance culture.
2. Identify the values, principles and guidelines of conduct that must govern the actions of the persons subject to their content, as a means to prevent risky or illegal situations.



## CODE OF CONDUCT AND GOOD CORPORATE PRACTICE

3. To convey our rejection of any practice that is irregular or contrary to the law and/or our internal regulations and to disclose the channel established for its communication.
4. To take into consideration the criminal liability of legal entities and to have the fundamental elements of their prevention model.

### 3. OUR VALUES

**Respect.** We act with respect because we want to be respected. We respect our staff, our client companies, those who participate in our studies and the rest of our stakeholders, because we know that only through respect can positive synergies be produced that favor understanding and creation.

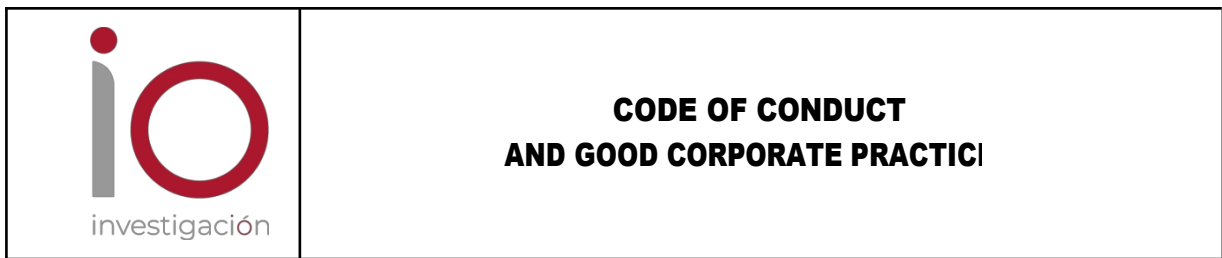
**Integrity.** We strive for honesty, both personal and professional, to serve as our calling card. Building a solid collective reputation is a complex task; losing it can be a matter of one day. Hence the importance we place on everyone subject to the Code taking care not only of the end result of their work, but also of the way in which they achieve it and project it to others.

**Confidentiality.** We act with confidentiality because the most important intangible asset handled by our organization is information. The security of data and the privacy of people guide all our actions.

**Professionalism.** We act with professionalism because we put our skills and knowledge into each project. We like to exceed the expectations of our client companies and we believe in good work as an individual and collective challenge. Supporting and fostering the talent of our professionals is a priority objective.

**Dynamism.** We act dynamically because we have to anticipate trends. We have to transmit in real time to our clients the variations that the market is experiencing and offer them useful responses to the challenges that they bring. We are at the forefront of knowledge to incorporate dynamic and innovative research methodologies. We always want to analyze more data in less time and provide different visions of reality.

### 4. WHO IS AFFECTED BY THIS CODE?



This Code of Conduct applies to all IO Group companies, to those who are members of their management bodies and to all their personnel, regardless of their position and function and the type of relationship they have with the organization (hereinafter referred to as "persons subject to the Code").

Its application may be extended, in whole or in part, to third parties, natural or legal persons, with whom we relate, or who act on our behalf or representation, when it is advisable or convenient for the fulfillment of the principles and values it contains and when it is possible due to the nature of the relationship.

## **5. OBLIGATION TO KNOW AND COMPLY WITH THE CODE**

All persons subject to the Code have the obligation to know and comply with its contents; to attend the training actions to which they are summoned for their adequate knowledge; and to collaborate in its implementation, including the obligation to communicate any risk and/or breach of the Code of which they are aware, for which they will be informed individually, requiring their express acceptance. Those who join the Group after its entry into force will assume these commitments at the time of hiring.

The persons who direct the different areas of the organization, or have personnel under their charge, shall ensure compliance with the Code in their respective areas.

To facilitate knowledge of the Code, an updated copy will be published on the corporate website.

## **6. THIS IS WHO WE ARE AT IO**

### **5.1. Submission to the law and the regulatory framework**

The persons subject to the Code assume the commitment to comply, without exception, with the legal framework in force in the place where they carry out their activity, as well as with the established internal rules, protocols and procedures. Likewise, they must respect the "ICC/ESOMAR International Code for the practice of Social and Market Research" and the Notes and Guides that develop it, self-regulatory framework of the profession that Grupo IO follows as an associate of AEDEMO (Spanish Association of market, marketing and opinion research), and that attend to the following basic principles:

*"Market research shall be lawful, honest, truthful and objective, and shall.*

*carried out according to the appropriate scientific methods.*

*The investigator shall not act in a manner that could discredit the profession or cause the public to lose confidence in it.*

*Market research must always be carried out with professional responsibility and in accordance with the principles of free competition recognized in the business world.*

*Market research should be clearly distinguished and kept separate from non-market research activities, including any commercial activity directed at respondents (e.g. advertising, sales promotion, direct marketing, direct selling, etc.)".*

Our management and middle management must be aware of this self-regulatory framework and require compliance with it by their staff and, where appropriate, by our stakeholders.

Persons subject to the Code must also avoid any behavior that, while not violating the law, our internal regulations or the self-regulatory framework, could result in damage to our reputation or interests or those of third parties with whom we have dealings. If we are being investigated in criminal proceedings or in administrative disciplinary proceedings that may affect the Group, we request that you notify us so that we can assess the possible repercussions on the organization.

## **5.2. Respectful work environment and responsible**

In Grupo IO we defend the rights of the people we employ and a dignified and respectful work environment, in accordance with the applicable legislation in the labor and Social Security fields. To this end, we do not tolerate any manifestation of harassment, abuse, intimidation, lack of respect or consideration, aggression, physical or verbal, or any other conduct of an intimidating or offensive nature, either vertically (from a superior in hierarchy) or horizontally (from a colleague); and we promote:

- a culture of hiring/promotion based on the principles of transparency, merit and capacity, facilitating the competition of candidates, ensuring that objectivity presides over these processes, respecting the

diversity and offering equal employment opportunities to those who enter or advance in the group;

- continuous training of employees that favors the assimilation of new research methods and is aimed at improving the knowledge and skills required for the proper development of each job position;
- staff progression with promotion and professional development policies that value the skills and expertise of employees according to their position;
- the creation of stable and quality jobs;
- A fair and equitable remuneration policy; in no case shall wage differences be established on the basis of personal, physical or social conditions;
- the strengthening of an open, safe and collaborative work environment, favoring teamwork, responsibility in decision making and freedom of expression; our management must remain alert to the appearance of any conflictive situation, which must be communicated immediately;
- the sense of participation and belonging of our employees, integrating this objective into our Human Resources policy;
- cultural diversity, allowing the access and promotion of qualified foreign workers legally authorized to work in Spain, under the same conditions as nationals;
- compliance culture among our personnel, especially our management and middle management, who have the obligation to lead by example;
- the principle of division of labor as the basis of our organizational structure; our processes must be based on a network of responsible decisions. It is up to our management to verify that each employee knows his or her task and is informed about his or her responsibility; and it is up to our employees to evaluate their tasks from a responsible perspective, taking into account

their technical skills and knowledge;

- effective equality between men and women, applying this gender perspective to correct inequalities in access to employment, training, professional promotion and the determination of working conditions; removing any obstacle that may limit the careers of our female employees; and guaranteeing the participation of women with the necessary qualifications in all areas and levels of decision-making, especially in those where they are underrepresented. To promote this equality, reconciliation measures may be approved that allow for a better balance between the family obligations and work responsibilities of our female employees;
- the rights of association, unionization and collective bargaining and a relationship based on mutual respect with the people who represent our personnel, in accordance with the functions and competencies legally attributed to them, and with whom a transparent, constructive and open dialogue will be maintained.
- a collaborative attitude with the labor and social security administration.

Grupo IO will not maintain commercial relations, or any other type of relations, with those who consent to or support any form of labor exploitation, especially forced labor or child exploitation, and we will not maintain relations with third parties, whether partners or suppliers, when there are reasonable suspicions that they may consent to or encourage such conduct or any other form of labor exploitation.

### **5.3. Honesty and professionalism**

Our staff, and in particular our field network, is the visible face of our organization. Not only do they represent us in front of our client companies, but also, on many occasions, they carry out their work on their premises. Therefore, we expect them to act with honesty, objectivity and professionalism and to approach studies and investigations under the following premises:

- do not mislead participants to obtain their cooperation or abuse their trust. The presentation or the form you use to address them should clearly define the purpose of the research or study, without

to mislead them, making it clear to them, when it is not obvious, that their collaboration is always voluntary at all stages;

- not to disturb or intrude on the privacy of participants or take advantage of their lack of knowledge or experience;
- take reasonable precautions to ensure that participants are not affected or harmed by such participation;
- Initially inform, in a clear way, that the activity being developed is a market research or study to distinguish and separate it from other activities that could be directed to the interviewees (e.g. direct marketing or advertising), when the methodology allows it;
- act honestly and not give the appearance, to the person participating, that there is a research purpose when there is not;
- not to act, intentionally or negligently, in a manner that discredits the profession or undermines the confidence of our clients or the general public;
- not to unjustifiably criticize or discredit the competition;
- refrain from making misrepresentations about their knowledge, experience or expertise, or about the IO Group;
- obtain prior informed consent from parents or guardians if interviewing minors, taking the above precautions;
- not knowingly permit the dissemination of market research findings that are not adequately supported by data and always be prepared to provide the technical information necessary to confirm the validity of the published results.

In short, IO values and promotes the experience, specific knowledge, trust and competence of its management and staff, promoting honesty in performance as a key element to address any activity that is carried out.



#### **5.4. Transparency**

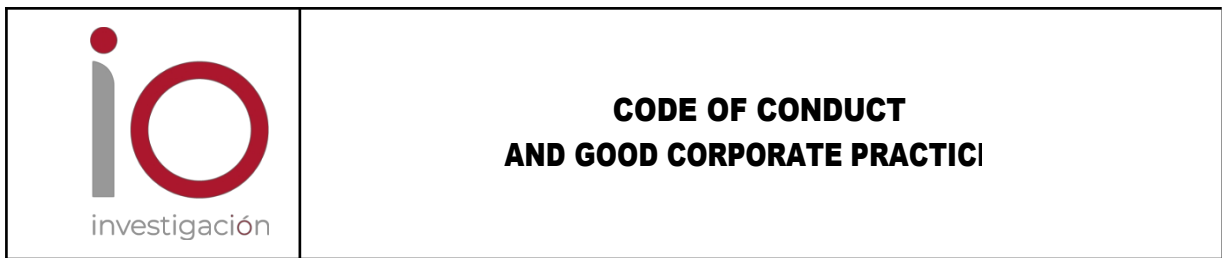
Transparency is a fundamental factor that consolidates the trust placed in us by our client companies, which is why we are so important:

- in relation to the people who participate in our research or studies: at Grupo IO we promote control and supervision measures that ensure that during the data collection process they will be preliminarily informed, clearly, concisely and unambiguously, of the identity of the company and of the person who is collecting the data; of the data to be collected and of the specific purposes for which they will be used. So that participants can verify that identity:
  - when interviewing field staff, whenever possible, a business card or thank you card with contact details should be given to them, or a personal accreditation issued by the company should be shown.
  - for telephone interviews, a contact number will be provided.
  - in the on-line surveys, an e-mail address
- in relation to our client companies: we will take whatever measures are necessary to ensure that the study or research is designed, executed, presented and documented accurately, transparently and objectively, providing them with the appropriate technical data from those we carry out and allowing them to take measures to verify the quality of the collection and processing of the information carried out, if requested.

#### **5.5. Neutrality political**

At Grupo IO we develop our business model without intervening in the decisions or political processes of the places where we carry out our business activities.

Any relationship with governments, authorities, political parties or federations of political parties and electoral candidacies, or with foundations or related or dependent entities.



of them, shall be based on the principles of legality and neutrality. It is forbidden to invoke the link with Grupo IO to make in its favor, directly or through interposed persons, donations or contributions, in cash or in kind, or to intermediate or facilitate their delivery.

We recognize the freedom of persons subject to the Code to belong to, collaborate and/or participate in political parties or other types of entities, institutions or associations whose purposes go beyond those of the Group, provided that they are not objectively incompatible with the function they perform, that they are carried out outside working hours and outside our facilities, and that it is clear that they are personal and outside the Group.

#### **5.6. Occupational safety, health and environment**

At Grupo IO we are concerned about the health and safety of our personnel. Therefore, based on the applicable legal framework, we allocate the necessary resources to ensure that they enjoy a healthy and safe working environment, carrying out periodic risk assessment processes with rigor and objectivity. We want to prevent ignorance from becoming a factor justifying risks, and to this end, we keep you informed of the critical aspects that you must address in the performance of your duties.

The persons subject to the Code, for their part, must look after their own health and safety and that of the people affected by our services and immediately report any situation that puts them at risk (such as insufficient occupational risk prevention plans, inadequate safety equipment, or any other non-compliance with safety standards and procedures) and any training needs they detect in this area.

In Grupo IO we do not admit the consumption of substances that affect the due fulfillment of professional obligations.

Likewise, we expect people subject to the Code to be responsibly committed to the conservation and care of the environment, striving to acquire habits and conduct aimed at minimizing the environmental impact of our activity and to follow the guidelines for continuous improvement set forth by the Group in this area.

## **5.7. Personal information and data**

Persons subject to this Code are obliged to maintain professional secrecy with respect to non-public information and data that they become aware of in or through the exercise of their activity, whether it originates from or refers to the Group itself, its personnel or management, or its stakeholders (client companies, participants in research projects, etc.) and must:

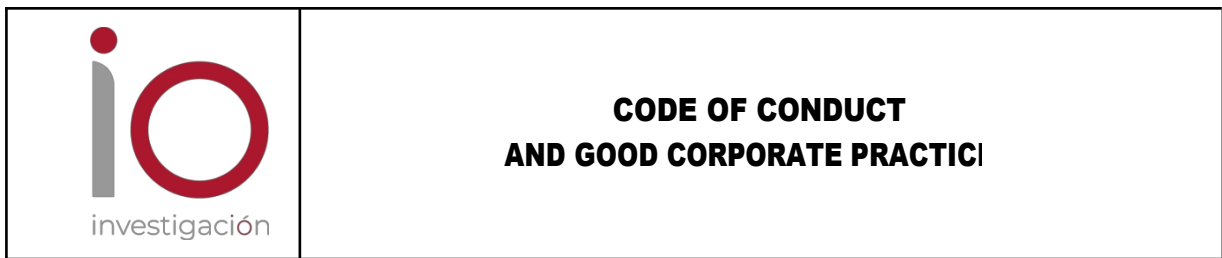
- use them exclusively for the performance of their professional activity and for the purposes for which they have been collected, in particular those arising from market research
- refrain from using them for their own benefit or communicating them to third parties, except for professional reasons and with the precautions required by law.
- refrain from destroying or deleting them without authorization.

When they leave the organization they will be reminded of their obligation to maintain confidentiality about those to whom they have had access.

In the course of our business, we sometimes collect, process and analyze personal data. In Grupo IO we control and comply, from a legal point of view, with all the legal obligations that are projected on the life cycle of personal data and we establish the controls that ensure compliance with current legislation. From a technical perspective, we adopt the organizational and security measures that guarantee the intangibility of these data, preserving them from alteration, loss, processing or unauthorized access, regardless of the medium on which they are stored. Our "Privacy Policy" is published on the corporate website for your general knowledge. In the research and studies in which personal data is collected, protocols will be established to prove that it has been made available to the owners of these data.

## **5.8. Security of the information**

At Grupo IO we guarantee the security of our files and computer systems. To this effect, we have implemented technical controls and security protocols that



safeguard the data handled in different layers, depending on the sensitivity of the information, and we have approved specific protocols to detect and prevent the leakage of information, especially confidential information, whether intentional or accidental.

We also have an exhaustive inventory of the applications, programs and operating systems that exist in the organization and internal procedures for downloading, installing and using software. Persons subject to the Code are prohibited from using illegal software or software not authorized by the Group in the performance of their duties.

### **5.9. Intellectual property and industrial**

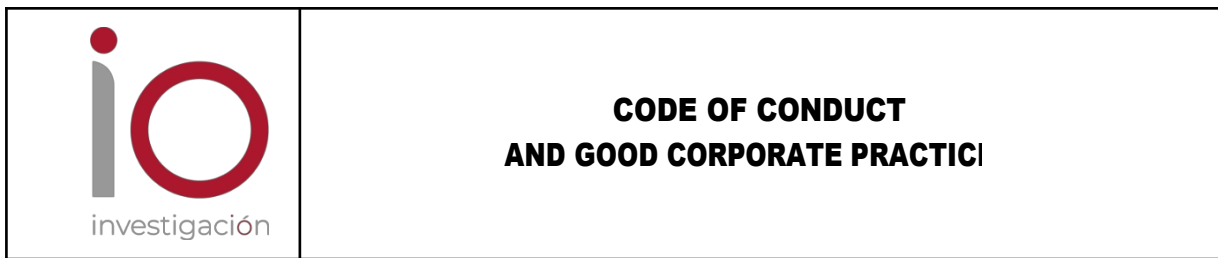
Persons subject to the Code must protect the organization's industrial and intellectual property rights and respect those belonging to outside persons or entities known to them through their activity in the IO Group, in particular rights to copyrighted works (such as courses, projects, software and computer systems; manuals and videos; knowledge, processes, technology, know-how, etc.). Unauthorized use, unauthorized duplication or use for purposes other than those authorized is prohibited, and must be returned at the end of the activity for the Group, or when required by the Group.

Intellectual property resulting from the work of personnel while providing services for the organization, and directly related to its activity, shall be the property of Grupo IO unless otherwise provided by law or agreement. If people who do not work directly for the IO Group participate in its creation, prior to its development, the distribution of rights over the result must be established.

It is forbidden to use the logo, brand or name of the IO Group or any of its companies outside the professional sphere.

### **5.10. Financial transparency and money laundering**

At Grupo IO we rigorously comply with current tax regulations and do not tolerate conduct aimed at the illicit avoidance of taxes or the fraudulent obtaining of aid or subsidies, which must be rigorously used for the purposes for which they were intended.



that may have been granted. The persons subject to the Code must collaborate with the Tax Authorities and the competent administrations, providing the information they are required to provide, without hiding or misrepresenting it.

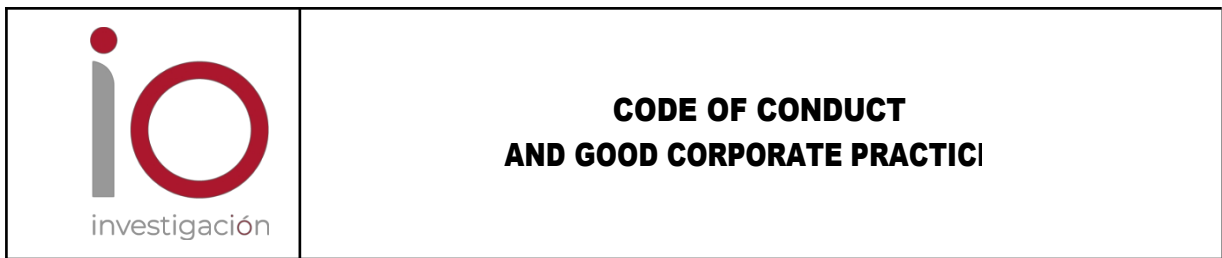
Those involved in accounting processes shall ensure that all payments and transactions are recorded and that the records, books and other documents provide a true and fair view of the organization's financial position, preserving their confidentiality. It is forbidden to alter, distort, conceal, transmit or transfer them in any form and on any medium.

Likewise, in Grupo IO we maintain a position of firm rejection in relation to money laundering and the use of tax havens and we will not create or acquire shares in entities domiciled in countries that have the status of tax haven. Any foreign investment through a newly created company, in collaboration with an existing one, requires, beforehand, a rigorous verification of the corporate purpose and the activities to be carried out and the establishment of an approved system of financial control that allows us to verify the legality of the accounting operations carried out.

The financial area must control unforeseen economic transactions or those which, due to their amount or nature, are unusual or are directed to or originate from accounts in tax havens. The persons in charge of finance shall ensure that they have adequate knowledge of the client companies, shall not open anonymous accounts, nor shall they authorize financial transfers without their due identification, or that of the person representing them, and shall endeavor to obtain verified information on the origin of their funds.

#### **5.11. Resources of the organization**

At Grupo IO we make various resources available to our personnel (vehicles, cell phones, computers, e-mail, etc.) in accordance with the principles of necessity and austerity in their hiring. The persons subject to the Code are responsible for their professional use (unless otherwise agreed), responsible and efficient, taking care of their conservation, ensuring their maximum use, and preserving them from any inappropriate use that could be detrimental to the interests of Grupo IO.



Special attention shall be paid to computer systems and technological equipment (e.g. tablet, smartphone, laptop...), the delivery of which shall be acknowledged, and which must be used in a secure manner. Under no circumstances may they be used to access other people's computer systems without authorization or to interrupt or hinder their operation, or to delete, damage or alter information contained therein or in the organization's systems without authorization. It is prohibited to disable the information security systems installed without permission. Any change, improvement or substitution intended to be introduced in them must be carried out by the competent department.

Said technological means may be subject to surveillance and control, through auditing or monitoring, within the regulatory framework of Article 20.3 of the Workers' Statute, to ensure their correct operation, guarantee the continuity of operations, avoid any type of abuse or fraudulent use or verify the employee's compliance with his or her labor obligations and duties.

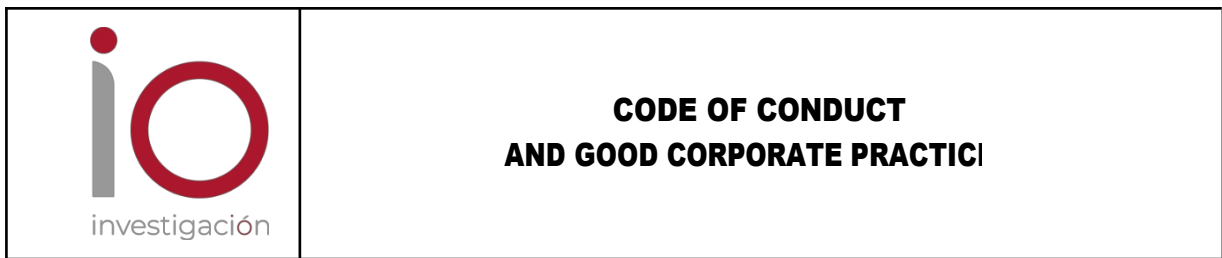
Staff may not use the organization's funds or cards to cover expenses that are not part of their professional activity, are socially unacceptable, in bad taste, or are incurred in an inappropriate context.

Anyone assigned a company vehicle shall use it responsibly and safely, with due diligence and prudence, respecting at all times the regulations in force, and in particular, the Traffic and Road Safety Code. You must alert the company if you know that it is necessary to check the vehicle or detect any anomaly or malfunction. Its use outside working hours, without express authorization, shall be the sole and exclusive responsibility of the person to whom it has been assigned. Likewise, he/she must take the necessary measures to prevent its loss, theft, damage or deterioration and shall be responsible for ensuring that it is not used by third parties outside the Group or unauthorized for this purpose.

## **5.12. social networks**

One of our most valuable assets is our corporate reputation. We want to keep it intact and we count on our staff to help us achieve this.

Open social networks (by way of example, LinkedIn, Facebook, Twitter, Instagram, Youtube, Myspace, Flickr, Yahoo/Msn Messenger...), forums or blogs on the Internet.



The Internet is a powerful communication tool, but its misuse by our personnel, not necessarily intentionally, could damage our corporate image or compromise confidential information.

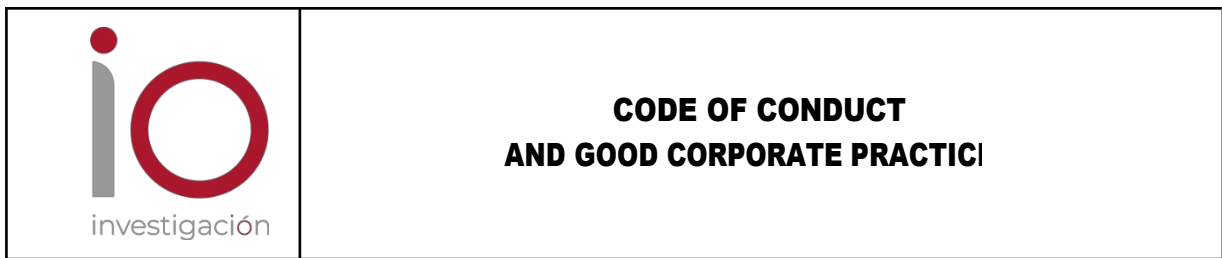
Therefore, when people working for Grupo IO create their accounts, participate or collaborate in these social networks, forums or blogs on the Internet, they must make it clear that they do so in a personal manner, without giving the impression that they represent the position of the Group. They shall take this into consideration when assigning a name to their pages or accounts, selecting a profile photo or icon, or issuing opinions or comments.

Digital monitoring systems may be established, through the periodic search and capture of data related to the Group and its sector of activity, allowing it to react early and effectively to reduce the possible negative effects of any content on social networks that may cause it harm (e.g. unofficial profiles that use distinctive signs, logos, brands or its IoT company name; publications or comments that compromise its corporate reputation or its data protection and confidentiality policy, etc).

### **5.13. We fight corruption**

In Grupo IO we want to express our zero tolerance to all forms of corruption and we expressly prohibit that persons subject to the Code, at any level, function or area of the organization, offer, promise, authorize or deliver, directly or indirectly, any kind of monetary incentive, commission, gift, retribution or other type of benefit, to any person in the public or private sector, directly or through intermediaries, with the purpose that, in breach of their responsibilities and, where appropriate, the law, they act or fail to act to favor them, the IO Group or third parties in a specific business or obtain an undue business advantage. Likewise, they must reject and immediately notify the Regulatory Compliance Committee of any request made to them in this regard by third parties.

Those who maintain relations with Public Administrations must always schedule and document them.



#### 5.13.1. We prevent conflicts of interests

Conflicts of interest are situations in which the personal interests (family, economic or otherwise) of the persons subject to the Code enter, or may enter, into conflict with the interests of Grupo IO, in such a way that they may alter the independence that should preside over the decision-making processes within the organization. For this reason, with absolute respect for their privacy, we at Grupo IO expect all of them to act objectively and professionally in such situations and to report them immediately to the Human Resources department.

When our personnel participate in other activities, on a voluntary and unpaid basis (e.g. in NGOs, associations, etc.), or on behalf of others, they must ensure that they do not involve a conflict of interest and do not impair the expected effectiveness in the performance of their duties in the Group. In addition, when they are employed by others, they must inform the HR Department.

Those joining the Group must disclose any potential conflict of interest at the time of hiring.

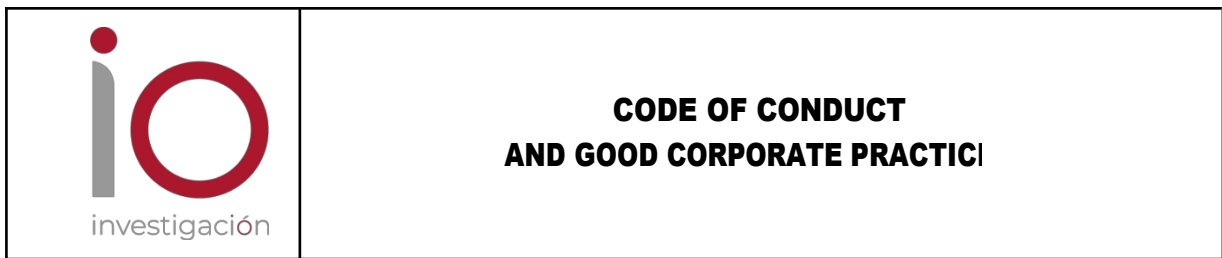
#### 5.13.2. Gift policy and attentions

Persons subject to the Code must not accept or request any gift or attention (gifts, invitations, discounts, tickets for entertainment activities, etc.) that, due to their frequency, amount, characteristics or other circumstances, could be interpreted by an objective third party as being made with the intention of affecting the impartiality of the recipient or obtaining an undue advantage; whose amount is high; or that are not part of a social courtesy. The same guidelines will be followed when it is the IO Group that wants to give a gift or attention to its clients, suppliers, collaborators or partners.

#### 5.13.3. Intermediation with the Administration Public Administration

In contracts or relations with Public Administrations, their agencies and companies, when intermediaries are used, a due diligence file shall be opened to ensure that the person or entity contracted offers an unquestionable and trustworthy professional track record and that there are no factors that may affect the quality of the services provided.





The Group's interests or reputation may be at risk as a result of significant risks in their hiring.

The file will be transferred to the Compliance Committee prior to the signing of the corresponding contract, which will expressly include a clause on the acceptance of the Code and an anti-corruption clause.

#### 5.13.4. **Payments from facilitation**

Facilitation payments, understood as payments, monetary incentives, commissions, retributions or other benefits directed to persons in the public or private sector, to expedite procedures (judicial, administrative or of any other nature) to which they are entitled, are strictly prohibited.

## **6. OUR ENVIRONMENT**

### **6.1. Relationship with our suppliers**

Persons involved in the contracting of suppliers, and/or having decision-making capacity or influence over them, must avoid any interference that may affect their impartiality or objectivity and the interests of the Group and, whenever possible, favor the expansion of the portfolio of suppliers under equal conditions, avoiding exclusive relationships, and following objective criteria that respect free competition. In the selection of the most advantageous offer, quality and cost criteria shall be reconciled with the continuity of the relationship with certain suppliers.

Grupo IO expects our suppliers to meet the same standards. Any immoral or illegal act by a supplier may result in the loss of such status. Whenever possible, the contracts signed with them shall state that there are no interests that could compromise the impartial and objective execution of the contract.

### **6.2. Relationship with our client companies**

Our personnel will avoid establishing exclusive relationships with personnel from other companies.

The Company's management is not responsible for any actions that may result in excessive personal involvement, such that the objectivity of its decisions may be affected, or for restricting access to the client company to other employees.

Likewise, and since we have a leading position in certain markets, providing services to different client companies within the same sector, we will always maintain a position of neutrality and strict confidentiality. In no case will we stimulate or hinder the execution of a transaction by one client company to benefit or harm another, unless both are aware of their different positions and expressly agree to carry out the transaction.

In all contracts entered into with client companies, whenever possible, it shall be stated that there are no ties, economic or otherwise, that could compromise the impartial and objective execution of the contract.

### **6.3. Our competence**

At Grupo IO we act in accordance with the principles of the social market economy, competing fairly and prohibiting: (i) any practice that causes confusion or induces deception in relation to the services we provide; (ii) denigratory acts aimed at discrediting the competition; and (iii) misleading or deceptive advertising.

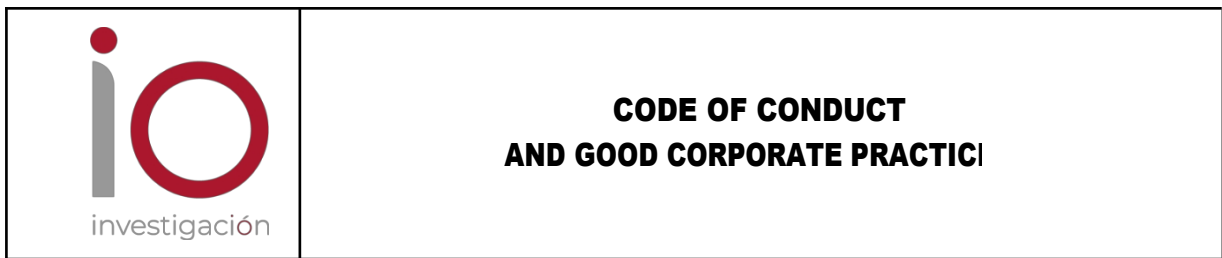
We are also committed to preventing possible anti-competitive practices, including those that may arise from agreements or pacts with other commercial or business partners (price fixing, market sharing, production limitation, etc.).

Any practice contrary to honest practices in business relations and, in particular, those that could violate free and fair competition in the market, shall be considered, regardless of its legality, harmful to this Code.

## **7. THE REGULATORY COMPLIANCE COMMITTEE**

The Regulatory Compliance Committee ("CCN"), a body reporting to the Board of Directors, which appoints its members, is responsible for the following functions:

- a) Implementing this Code and the standards, protocols and rules of this Code.

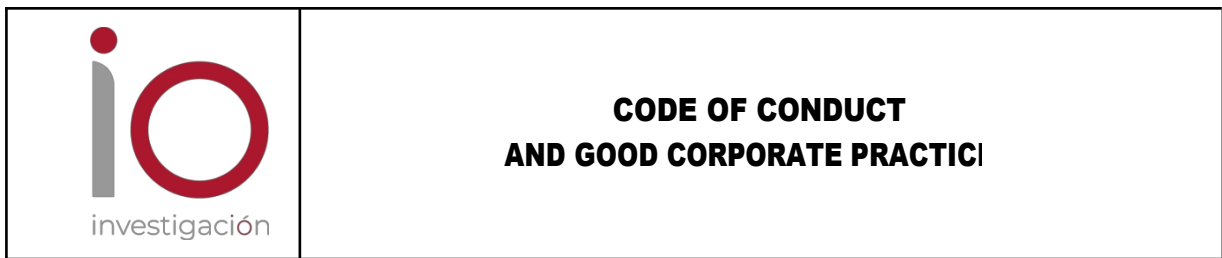


procedures that are dictated in development and guarantee of the same.

- b) Assume responsibility for the management of the Internal Information System, in accordance with Article 8 of Law 2/2023, of February 20, regulating the protection of persons who report regulatory violations and the fight against corruption.
- c) To submit to the Board of Directors, for its approval, the procedures, rules, protocols, sectorial manuals and circulars issued for the development of the Program, with the exception of the CCN's internal regulations, which shall be approved and modified by the CCN itself, under its supervision.
- d) Determine the contents and plan the training on the Program.
- e) To inform and advise on any doubts that may arise from the application of the Program and the set of procedures and provisions that comprise it.
- f) Prepare periodic reports on the effectiveness of the measures adopted, particularly those aimed at the prevention of crimes and administrative sanctions.
- g) Adapt the Program to the Group's future activities, to new risk areas detected and to changes in legislation and court rulings.
- h) To prepare an annual report on the activities carried out in relation to the Compliance Program and to suggest any improvements that, in its opinion, should be made to it.

A rule shall regulate its composition and internal functioning. The NCC shall not, under any circumstances, hold specific powers, not even by way of representation, that would allow it to intervene at the management level, nor to take, on its own, decisions that directly affect the organization's operations. Nor may it carry out disciplinary measures, or resolve contractual relations, agreements or previously established agreements on its own.

The administrative body, upon a reasoned proposal from the NCC justifying its convenience, may designate, for some companies or centers, one or more Compliance Officer(s) to assist the NCC in the specification and planning of activities related to the development of the Code and risk prevention,



ensure the observance and effectiveness of the measures established and inform personnel of any doubts they may have in this regard.

## **8. RESPONSIBLE CHANNEL**

Our internal channel is *Canal Responsable*, an online tool owned by an external company and accessed through the corporate website. The channel allows the submission of communications, even anonymously, with full guarantee of confidentiality and indemnity, without prejudice to any actions that may proceed in the case of false or bad faith communications.

Persons subject to the Code must report, through the *Responsible Channel*, any breaches of the Spanish legal system of which they are aware, especially those of a criminal or administrative nature; breaches of European law and irregularities or breaches of internal regulations, including those related to this Code and the Program, with their confidentiality and indemnity being guaranteed. It may also be used to formulate complaints, claims, interpretative doubts or suggestions regarding regulatory compliance.

*Canal Responsable* is open to other stakeholders linked to Grupo IO, such as partner companies, customers or suppliers, whose communications will be treated in the same way as internal communications, so their confidentiality and indemnity is guaranteed.

The operation of the Responsible Channel and the procedure for processing communications is regulated by internal regulations.

**10. DISCIPLINARY REGIME**

Infringements that occur due to violation of the mandates contained in this Code may give rise to the application, in an appropriate and proportionate manner, of the sanctioning regime established in the labor regulations in force or in the applicable collective bargaining agreement. All of the above without prejudice to reporting the facts to the competent authorities in case criminal or administrative sanctions may be applicable.

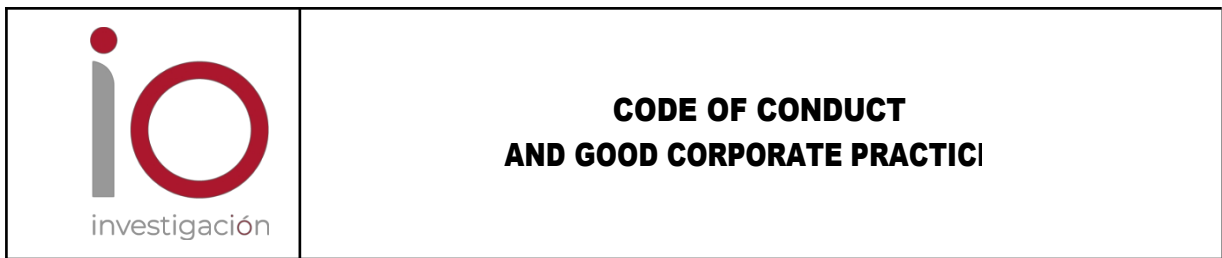
**11. QUESTIONS**

Any doubts about the content of the Code, or about any document of the Program, may be addressed to the CCN through the channel. Any possible imprecision, ambiguity or contradiction detected will be solved according to the principle of prevalence of the most restrictive norm. If specific advice is required on any of the topics included in the Code, staff may contact the person responsible for the area specializing in that subject:

<b>Responsible area</b>	<b>Subject</b>
Legal, accounting and HR	<ul style="list-style-type: none"> <li>● Submission to the law and the regulatory framework</li> <li>● Respectful and responsible work environment</li> <li>● Honesty and professionalism</li> <li>● Transparency</li> <li>● Political neutrality</li> <li>● Occupational safety, health and environment</li> <li>● Financial transparency and money laundering</li> <li>● Corruption               <ul style="list-style-type: none"> <li>○ Conflicts of interest</li> <li>○ Gifts and hospitality</li> <li>○ Intermediation with the Public Administration</li> <li>○ Facilitation payments</li> </ul> </li> </ul>
Networks and systems	<ul style="list-style-type: none"> <li>● Secrecy of information and protection of personal data and privacy</li> <li>● Intellectual and industrial property use of software</li> <li>● Use of resources and social networks</li> </ul>

**12. APPROVAL OF THE CODE AND**

This Code shall come into force on the day following its approval by the Board of Directors of Ideas Originales de Investigación S.A. and shall be reviewed when the following



The report shall be updated periodically, taking into account the suggestions and proposals made by employees, without prejudice to any changes in the organization, in the control structure or in the activity carried out that may make it necessary.