



CODE OF ETHICS

BETWEEN
ENGINEERING + IT SOLUTIONS

 **Hopla!**TM
Software

GAMMAUX

 **DMD**
SOLUTIONS

DQSCONSULTING
DIGITAL BUSINESS INNOVATION

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1. Introduction

The **BETWEEN TECHNOLOGY GROUP** (hereinafter, the "BETWEEN GROUP" or the "Group") is made up of five organizations: BETWEEN TECHNOLOGY S.L., HOPLA SOFTWARE S.L., USABGAMMA S.L., DMD AERONAUTICS ENGINEERING S.L. y DQS DYNAMICS QUALITY SERVICES CONSULTING GROUP S.L., with BETWEEN TECHNOLOGY S.L. being the parent company of the other four.

In November 2019, with the aim of accelerating its national and international growth, BETWEEN TECHNOLOGY, S.L., became part of *The Talent Club*, thus becoming one of the companies that make up the best international talent representation group. It currently has a presence in the main sectors of the market and has more than 550 professionals on staff. This organization is a multinational technology consultancy with more than 20 years of experience, which was born from the merger of INGENIERÍA SOLID with ADICIONA Servicios Informáticos in July 2015, with the purpose of offering a wide range of services and technological solutions for its clients. The Organization combines the expertise of two companies with a long career in the fields of mechanical and electronic engineering, computer science and software, operations, and continuous process engineering (chemical and petrochemical).

In 2021, BETWEEN took a majority stake in HOPLA SOFTWARE S.L., which is a technology consultancy that was born in the 80s with the aim of helping medium and large companies in their digital transformation projects through the modernization of their applications and infrastructures, open source, both on-permise and in the cloud. In addition, HOPLA SOFTWARE is the parent company of HOPLA Software Colombia and HOPLA Software Mexico.

It was also in 2021 that BETWEEN acquired a majority stake in USABGAMMA S.L., which is a UX and digital innovation consultancy that was born in 2002 to put the user in the value chain of clients' businesses. The objective of the Organization has been, since its foundation, to help, through consulting and talent recruitment, companies to achieve their objectives and boost their business by putting the user at the center of the creation process. The Organization has two lines of business, on the one hand, research with users through different research and analysis methodologies that help its clients visualize the future of their products or services, ensuring that they meet the needs of their users and business objectives. On the other hand, the UX/UI design and product definition, from the creation of the prototype to the visual style, incorporating feedback from end users and stakeholders.

In June 2023, BETWEEN acquired DMD AERONAUTICS ENGINEERING S.L., a limited company founded in 2014 and specialised in engineering services for the aerospace industry with a focus in the field of reliability, availability, maintainability and safety (RAMS) mainly for the aeronautical, aerospace and drone industries. The Organisation helps aerospace companies address their challenges with a holistic approach, effectively acting as the remote safety and reliability team for manufacturers needing support in certification efforts. The Organisation also provides aerospace design engineering in a talent-as-a-service model,

finding the right person for the right project and shaping the careers of its community of experts. The working method is based on team cooperation, even when a single engineer is sent to the site, his work is supported by DMD Solutions' network of experts.

Finally, in October 2023 it acquired DQS DYNAMICS QUALITY SERVICES CONSULTING GROUP, S.L., which is a limited company specialising in consultancy services and the development and implementation of systems, applications and software. DQS is a technology consultancy born in 2014 to innovate in the business model, helping companies to digitally transform, aligning strategies, processes and resources by incorporating them into their business culture. Currently, the organisation has five strategic headquarters in Spain, with offices in Barcelona, Madrid, Valencia, Castellón and Palma, with more than 100 professional experts in the development of business transformation projects through the implementation of Microsoft solutions, making it a 365 consultancy. DQS also has specialists in the management of key profiles, including ERP/CRM, Systems and Networks, Data, Artificial Intelligence, Consulting, Development, Project Management and Cybersecurity.

This Code of Ethics sets out the rules, commitments and criteria for action that must guide the conduct of the Group's employees in the performance of their functions and responsibilities, as well as the stakeholders linked to the Group. Our Code of Ethics is the foundation of our culture.

Within the current framework of the Criminal Liability of Legal Entities (RPPJ), and with the aim of preventing the commission of criminal conduct that can be carried out voluntarily or involuntarily within the Group, a Compliance System has been developed and implemented, and this Code of Ethics has been approved, which sets out our values, principles and guidelines for action.

We are grateful for the commitment and trust shown, and we encourage our staff and collaborators to apply the ethical principles and conduct set out in this document in all the activities carried out on a daily basis.

2. Objectives of Ethical Code

The purpose of this Code of Ethics is to establish the guidelines that must govern the ethical behaviour of all the people who work in the Group's organisations, in their daily development, in internal relations and in the interactions, they maintain with all stakeholders, managers, suppliers and customers.

Through this Code, we compile our values, missions and ethical standards that make up our organizational culture.

Complying with these guidelines will help us to be a company that bases its management model on transparency, equality, and honesty. Respect for this Code and its rules, as well

as professional/labour management based on the principles established herein, will be mandatory.

The nature of this Code is not intended to cover all possible situations that may occur in the company's own business, but rather its purpose is to establish general guidelines of conduct that guide all professionals who are part of the Group in the way they act during the performance of their professional activity.

3.Scope

The Code is addressed at all levels, both to managers and to each of the staff, direct or indirect collaborators, external professionals and specialists, suppliers and other personnel who have some type of relationship with the Group.

This Code of Ethics is mandatory and will apply to the following persons, "obliged subjects", whether natural or legal:

- ☐ Members of the Board of Directors and other entities that make up the different organizations of the Group, regardless of their composition, form and operating regime.
- ☐ Executives and middle management of the Group.
- ☐ Group employees, regardless of the type of contract that determines their employment relationship, the position they hold, or the geographic area in which they perform their work duties.
- ☐ Customers, suppliers, shareholders, and any other stakeholders who have direct links with any of the Group's organisations, to the extent that this document may be applicable to them.

4.Mission, Vision and Group Values

Our **Mission**, as a Group, is to provide knowledge and optimal solutions to each client through talent and technology, seeking the best way to meet their expectations.

Therefore, our **Vision** is focused on leading the technology consulting market through the talent and involvement of the people who make up the Group, differentiating ourselves through quality and agility in adapting to the needs of our clients.

The essential foundations for achieving the milestones set are the Values that define us as an organisation, as they guide all our actions and decisions. The Group's Values are:

- ☐ **Honesty:** we act with honesty and integrity to repay the trust placed in us.

- 🔍 **Professionalism:** we fully develop tasks and responsibilities to the best of our abilities in order to meet our daily commitments and challenges with a high degree of involvement with the company's global project.
- 🔍 **Respect:** we permanently promote cordial and respectful relations with our customers, suppliers and third parties, and among the members of our Organization, respecting the diversity of opinions and recognizing dialogue as a tool to reach consensus.
- 🔍 **Meritocracy and equal opportunities:** Professional growth will absolutely depend on effort, involvement, quality of work and individual skills.
- 🔍 **Teamwork:** we cooperate among colleagues and join forces to achieve the Group's global objectives more efficiently.
- 🔍 **People-oriented:** We consider the people who make up our organization as individuals, facilitating the reconciliation between their professional and personal lives.
- 🔍 **Rigour:** We are objective, we analyse reality and we act based on the data we obtain.
- 🔍 **Productivity:** We have initiative, we are ready for change and we provoke it.

5. Respect for the Law and Human Rights

Our Organisation is committed to complying with the laws and regulations in force that are applicable to our Organisation in each of the countries in which we operate. All the Group's professionals must carry out their activities with the utmost respect for current legislation and, to this end, the Group undertakes to provide the necessary means for its employees to be aware of and understand the regulations that affect them in the exercise of their functions and responsibilities.

On the other hand, the Group ensures the defence of Human Rights in each of the processes carried out in the development of its activity, being very aware of the responsibility of our Group to protect them. In this regard:

- 🔍 We do not knowingly conduct business with subcontractors or suppliers who use child labour, forced labour, human trafficking, and/or child exploitation.
- 🔍 We fully comply with the regulations on working hours and decent remuneration.
- 🔍 We always promote the health and safety of our workforce wherever we operate.
- 🔍 We always ensure that our suppliers comply with international standards on child labour, forced labour, labour rights and labour protection, contracting with those who strictly meet all requirements, and ensuring that the quality they offer us is up to what our customers expect from the Group.
- 🔍 We always ensure that our organization's activities do not have a negative impact on the communities in which we operate, whether environmental, social, cultural, or ethical impacts.

Beyond the legislation that is included in the context in which the BETWEEN GROUP operates and carries out its activity, the members of the Group must guarantee respect for the dignity of people, equality and non-discrimination on the basis of sex, sexual orientation or identity, race, ideology, religion or beliefs and their family situation.

6. Principles of Ethical action of the Between Group

In order to properly develop this Code of Ethics, the Group is guided by the following ethical principles to create a culture of ethics and compliance with our economic agents:

- ❑ **Respect for current legislation:** the obliged subjects, as well as the suppliers, partners and collaborators of the Group, must comply with the laws in force in the place where their activities are carried out. Likewise, they must avoid any conduct or action that, even if not violating the law, may damage the reputation and image of the Group. All members and collaborators of the Group must be aware of the laws and regulations that affect their functions and responsibilities, requesting accurate information from their superior or the appropriate bodies.
- ❑ **Respect for people:** at the Group we are fully committed to consolidating a work environment where the dignity and non-discrimination of people on the grounds of age, disability, ethnic origin, sex, race, political tendencies, religion or sexual orientation is respected, ensuring that people can work in an environment free of harassment of any kind.
- ❑ **Effective equality:** the Group has developed a well-defined culture and values that show a formal stance that is fully aligned with Equality. At the Group, equality is part of the company's values.
- ❑ **Respect and protection of children:** the Group promotes strict compliance with international standards on children's rights in its business activities.
- ❑ **Use and protection of the Group's professionals:** the Group provides its members with the necessary resources for the development of their professional activity and undertakes to provide the means for their protection and safeguarding. People are the basic and fundamental element of our Organization, hence the need to guarantee a high level of safety, health and well-being, making every effort within our reach to promote the improvement of the conditions in which work activities are carried out.
- ❑ **Respect for our competitors:** At GRUPO BETWEEN we always respect our competitors by strictly complying with the Competition Laws, as well as Industrial Property, because in the Group we believe in healthy and legal competition with our commercial competitors.

- ☐ **Our suppliers:** All suppliers working with the Group must commit to respecting human rights, ensuring that child labour is not used and that there are no violations of workers' rights. They must also comply with international regulations and standards.
- ☐ **Corporate image and reputation:** the Group considers its image and reputation as one of its most valuable assets to preserve the trust of its employees, customers, suppliers and society in general. We ensure that the corporate image and reputation are respected and correctly used by all people linked to the Group.
- ☐ **Loyalty to the company and conflicts of interest:** the relationship between the company and its employees will be based on loyalty that stems from common interests; therefore, the participation of its members in other financial or business activities is respected as long as they are legal and do not interfere with their responsibilities as members of the Group.
- ☐ **Respect for the environment:** the company, in the development of its activities, will act in the most respectful way possible with the environment, promoting among its staff, customers and suppliers, the adoption of measures that minimize the company's impact on the environment and the effects of pollution. The Group is committed to making sustainable use of resources.
- ☐ **Our Corporate Social Responsibility:** The Group has been aware for several years that society has been showing an evident interest and concern about the impact that the activities of companies have on the environment, both from a human and environmental, social or cultural perspective.

7. Principles of the Compliance Management System

The principles governing the Compliance Management System are:

- ☐ Protection of personal data, reserved and confidential information.
- ☐ Protection of intellectual and industrial property.
- ☐ Fight against corruption and bribery and prevention of conflict of interest management.
- ☐ Due diligence in the administrative, economic, and financial management of the company.
- ☐ Respect for free competition.
- ☐ Transparency and honesty in the selection of suppliers.
- ☐ Prevention of money laundering.
- ☐ Principle of non-discrimination and equal treatment.
- ☐ Protection and security of our employees.

8. Ethical and responsible behaviour

8.1. Standards related to ethics and governance

Protection of personal data

The BETWEEN GROUP understands the protection of personal data as a fundamental right to preserve the privacy of individuals. The Group fully respects the privacy of its members and the third parties with whom we deal and therefore complies with the legal regime for the protection of personal data, using and processing them in accordance with the provisions of current regulations on the protection of personal data. specifically: Regulation (EU) 2016/679 of 27 April 2016 on Data Protection *Regulation (GDPR)* and Organic Law 3/2018 of 5 December on the Protection of Personal Data and Guarantee of Digital Rights (LOPDGDD).

All the Group's employees, to the extent that, as a result of their professional activity, they may have access to personal data files, will maintain absolute confidentiality regarding them. All members of the Group undertake to respect the personal and family privacy of the people to whose data they have access and to use them for specific, clear and legitimate purposes, being kept for the precise time of the purpose for which they are processed.

In the event of requests for information, seizures and/or blocking of client positions by Public Administrations, all members of the Group must answer and provide the data strictly requested by the competent body.

We are aware of the importance of the protection of data, both our own and others, which is why we have the support of professionals who are experts in the field in order to guarantee maximum respect for the regulations and the personal data of our economic agents.

Confidentiality of Information

At the Group, we believe that obtaining and properly using information are competitive advantages and, therefore, its administration and management must be carried out in a responsible, secure, objective manner and in compliance with confidentiality commitments. In this regard, all members of the Group undertake to maintain confidentiality and to make good use of the data, information or any document obtained during the exercise of their responsibilities in the Group, in accordance with internal regulations.

Employees who have reserved or confidential information of the Group or of third parties must preserve it so that it cannot be used inappropriately and refrain from misusing it for their own benefit or that of third parties. Likewise, the disclosure or communication of the same to third parties is prohibited, except when it is required for business reasons or has the corresponding authorization to disclose it. In this case, the line manager or the

Compliance Committee will always be notified in writing. In the event of any doubt as to the nature of the information, staff should consider it as confidential until otherwise indicated.

Confidential information shall be considered to be any data or information not officially published relating to the Group, its customers, its suppliers, the provision of services, the financial statements or any information that confers a competitive advantage in the market. By way of example, but not limited to, the following are considered confidential information:

- ❑ Customer lists or data.
- ❑ Supplier lists or data.
- ❑ Accounting information and operating accounts.
- ❑ Cost of products.
- ❑ Terms and conditions, fees or fees offered to clients.
- ❑ Marketing and strategic plans.

In addition, as established by the recent *Law 1/2019, on Trade Secrets*, any information or knowledge, including technological, scientific, industrial, commercial, organisational or financial knowledge, is included in its sphere.

The duty of confidentiality will remain once the activity has concluded, and the Group's staff will be obliged to return any material they possess related to the Group, at the time of termination of their employment relationship.

Protection of Intellectual and Industrial Property

The Group is committed to the protection and respect of intellectual and industrial property rights, both our own and those of others, and we demand the same commitment from our suppliers and collaborators. In this regard, the Group prohibits any action that may infringe the industrial and intellectual property rights of both the Group and third parties.

The Group's staff and, in particular, the employees who provide engineering and computer consultancy services, undertake to respect the industrial designs, patents, computer programs, calculations, plans and models registered by the competition, avoiding any type of copying, modification, alteration, plagiarism or reproduction that may occur of them.

In relation to the computer programs used by the BETWEEN GROUP's employees, the *software* installed on the Group's computer equipment will be controlled. Only IT personnel or personnel designated by IT may install *software*. The members of the Group will only use the computer systems and *software* for which they have an authorization to use and provided that the corresponding license has been acquired. The Group reserves the right to ensure that *software* authorized by the Group and that it has been acquired legally is always used.

Likewise, the members of the Group may not use for private or third-party purposes, the computer programs, or systems of which the Group owns the intellectual property.

The following shall be included in the scope of protection of intellectual and industrial property rights: copyrights, industrial designs, patents, utility models, distinctive signs, trade secrets, strategic or *marketing* plans, catalogues, studies, drawings, photographs, graphics, plans, maps, models, and computer programs.

Fight against corruption and bribery

Corruption and bribery occur when the staff of an Organization, regardless of their professional status, make use of unethical practices to obtain some benefit for the Organization or for themselves. From the BETWEEN GROUP we follow a culture of zero tolerance to any form of business, transaction, agreement, considered as corruption, bribery or fraud and we are committed to respecting the standards of conduct and anti-corruption legislation of all the countries in which we do business and reject any form of existing corruption, whether active or passive, direct or indirect.

In particular, Group professionals may not:

- ❑ Give or receive any kind of bribe or commission, from any other party involved, such as public officials, Spanish or foreign, personnel of other companies, political parties, authorities, customers, suppliers and shareholders. Acts of bribery, which are expressly prohibited, include the direct or indirect offer or promise of any kind of improper advantage, any instrument for its concealment, as well as influence peddling.
- ❑ Receiving, on a personal basis, money from customers or suppliers, even in the form of a loan or advance, regardless of loans or credits granted to Group professionals by financial institutions that are customers or suppliers and that are not involved in the aforementioned activities.
- ❑ Giving or accepting hospitality that influences, could influence or could be interpreted as influencing decision-making.

The BETWEEN GROUP works proactively to combat corruption and illegal activities and dissociates itself from any form of corruption, whether direct or indirect. In this regard, we are committed to acting in our operations in a transparent and honest manner, and to working proactively to combat corruption.

Any member of the Group must ensure compliance with the internal control established to avoid irregularities and undue advantages in the development of the Group's relationship with third parties, especially in those relationships that are carried out in countries and/or territories where corruption is a widespread practice and in those operations that involve the participation of a public authority. We also extend our commitment to our suppliers, who will be required to meet the highest standards of ethical behavior and regulatory

compliance. Likewise, those *partners* that the Group may use for the commercial development of the Group's normal activity must assume commitments similar to those set out in this section.

All members of the Group must refuse and inform the Compliance Committee of any delivery or request for gifts, gifts, compensation or payments aimed at obtaining advantages or influencing decisions that may affect the BETWEEN GROUP.

Relations with Public Administrations

At Between Group we do not tolerate any form of corruption, regardless of whether it involves Public Administrations, Officials and Authorities. Relations with them will be governed by the principles of legality, loyalty, trust, professionalism, collaboration, reciprocity and good faith, without prejudice to the legitimate controversies that, respecting the above principles and in advocacy of the social interest, may arise with these authorities in relation to the interpretation of the applicable regulations.

It is prohibited to offer, promise, authorize, and deliver anything of value (including any item, service, or anything else, whether as a personal benefit or favor, or otherwise) to any regulatory body, directly or indirectly through any third party, in order to secure an improper advantage or to obtain or retain business. Similarly, it is not permitted to solicit, agree, receive and/or accept anything of value to yourself or any other person or entity, by officials, authorities, and regulatory bodies in order to ensure an inappropriate advantage or influence for their business decisions.

Prevention of Conflicts of Interest

The members of the Group undertake to make decisions that affect their area of responsibility for the benefit of the Group and without being based on personal interests, whether economic, family or of any other kind.

A conflict of interest arises when the personal interests of employees, directly or indirectly, are contrary to or conflict with the interests of the Group, interfere with the fulfilment of their professional duties and responsibilities or involve them in a personal capacity in any transaction or economic operation of the Group.

Any conflict of interest, actual or potential, may damage the reputation of the Group, therefore, the members of the Group must avoid any situation that may give rise to a conflict between their personal interests and the interests of the Group, refraining from intervening or influencing decision-making in situations in which they directly or indirectly have or may have a personal interest.

The employees, therefore, undertake to make decisions that affect their area of responsibility for the benefit of the Group and without being based on personal interests.

Situations, including but not limited to, that may pose a potential conflict of interest are the following:

- ☐ Acceptance/delivery of gifts, commissions, or payments that compromise our ability or the ability of third parties to make professional and objective decisions.
- ☐ Have a personal interest in a supplier, customer, competitor or contractor of the Group.
- ☐ The improper use of the position held in the company for personal gain.
- ☐ Compete with any business activity of the Group.

In the event that any member of the Group is faced with a situation of personal conflict of interest, whether direct or indirect, or in situations in which there may be any doubt, the employee must immediately report it to his or her line manager or the *Compliance Committee*.

Gifts, hospitality and other courtesies

Gifts and/or invitations that are granted or received by the Group are characterized by promoting the image of the Group, but they must always be within the framework of social and commercial relations, strictly limiting ourselves to what is considered necessary and acceptable.

In the course of our business, we may exchange gifts and participate in social events to foster good business relationships with other organizations, customers, and/or suppliers. However, the members of the Group may not accept or deliver gifts or other attention, except when they are of symbolic value or mere courtesy, and provided that they do not condition the professionalism or independence of the person who accepts them. The Group rejects any type of practice that involves influencing the will of third parties to obtain any unjustified benefit or advantage. Third parties will also not be permitted to use these practices with our employees.

The recipient of the gift will always be the Group, at its registered office, and this will be stated in the delivery address, without prejudice to the fact that, within the Group, it is addressed to a specific department or position. Deliveries to the home address of the recipient of the gift will never be accepted or delivered.

As a general rule, a business courtesy gift or invitation may only be offered or accepted if its value does not exceed €150. Gifts in excess of this amount must be immediately reported to the *Compliance Committee*, which will resolve any issues related to this point and inform them of the correct limits to be applied.

On the other hand, any form of gift to authorities, Spanish or foreign public officials, political parties or auditors, including their relatives, that could influence the independence of their judgment or induce them to guarantee any type of favor, is expressly prohibited.

Economic and financial management

The Group and its members have an obligation to ensure the accuracy of our financial statements and reports as required by applicable law and accounting principles. In this regard, all financial transactions shall be accounted for in accordance with generally accepted accounting principles, in a correct and non-misleading manner.

The Group has various controls in place in the management processes of financial resources, which contribute to preventing, detecting and managing economic risks that may occur in our Group. It is essential to ensure the accuracy of any financial statement, in order to show the true and true picture of the Group.

Any operation, business, or contract, whether economic, financial, service provision or any other modality, with the partners, administrators or related companies must be carried out in accordance with current legislation. For the BETWEEN GROUP, it is important to comply with any accounting, tax and financial regulations, in order to guarantee transparency and protect the interests of any of our economic agents.

At the same time, the Group undertakes to take the appropriate due diligence measures with respect to the tax and Social Security obligations that it must comply with in order to carry out its activities and procedures, as well as to provide any information requested in this area by public bodies.

Commitment to the environment

The Group is committed to protecting the environment, including pollution prevention and sustainable use of resources.

At the Group, we recognise the importance of the environment and, therefore, we carry out our activity considering respect for the natural environment, the minimum consumption of resources and the control of environmental impact.

Commitment to local communities

The Group is committed to respecting the local communities of the sites where it operates, including respect for the local culture, language and ways of life.

The Group recognises the importance of not having a negative impact on the social environment of operation and therefore develops good implementation and recruitment practices considering the social reality of the communities where the staff will travel.

8.2. Market-related rules

Relations with business partners

The members of the Group will maintain a relationship with business partners (customers, suppliers and *partners*, among others) with strict respect for the principles of legality, transparency, honesty and contractual good faith.

Clients and their satisfaction are our main priority, which is why we carry out an exhaustive control and monitoring during the development of projects and our consulting services, establishing the most appropriate periodic communication channels with the client and basing our relationship on professionalism, seriousness, and reliability.

At the Group, we regularly choose and evaluate our suppliers with the same criteria that our customers use with us, in order to maintain a balanced workflow with real added value. We use objective and transparent criteria in our selections and always in accordance with the values and principles established in this code.

At the Group, we strive to fulfil the agreements and commitments established with our business partners, basing our relationships on transparency and mutual trust. The BETWEEN GROUP promotes compliance among its suppliers *and partners* with the principles contained in this Code of Ethics and the current regulations applicable to its activities.

Respect for free market competition

From the BETWEEN GROUP we promote free, fair and honest competition. The Group is committed to respecting the nature and content of all competition laws wherever the Group operates. These laws prohibit, as a general rule, price-fixing, division of territories, collusion with our competitors, and other business practices that adversely affect our customers and/or restrict competition. It is, therefore, everyone's responsibility to know and fully comply with the regulations applicable to our Organization.

The following are some of the practices prohibited by the Group:

- ❑ Enter into pricing agreements.
- ❑ Allocate market shares, either formally or informally, among competitors.
- ❑ Distribution of production areas or programs.
- ❑ Fraudulently manipulating tenders.
- ❑ Restricting or limiting production in order to reduce competition.
- ❑ Favor the exclusion of contracting parties.

The Group's personnel makes use of third-party information, including information from competitors, always respecting the legal framework as well as the values and ethical

principles established by the Group. Manipulation, concealment of information, improper use of privileged information, misrepresentation of real facts or any other unfair practice is prohibited.

Prevention of money laundering

The Group rejects any form of money laundering and is committed to complying with applicable legislation in all the countries in which we operate. Our commitment extends to our business partners, who must comply with anti-money laundering regulations.

Money laundering consists of carrying out operations with the aim of incorporating into legal economic traffic certain assets that come from illegal actions. Specifically, the members of the Group must pay special attention to all those operations or patterns of behavior that are considered complex, unusual or without apparent economic or lawful purpose. If any suspicion is detected in this regard, the hierarchical superior or the *Compliance Committee must be* immediately informed so that it can be studied, analysed and determined how to proceed in this situation and whether it is necessary to give notice or report it to the competent authorities.

In addition, the Group undertakes to cooperate with the authorities and any control body, and to provide them with the information and cooperation necessary for them to carry out their functions in the best possible way.

8.3. Rules related to professional activity and internal relations

Promotion of equal opportunities, prevention of workplace harassment and discrimination

The Group is fully committed to equal treatment and opportunities in personnel selection procedures, access to training, compensation, internal mobility, and professional development, and rejects any type of direct or indirect discrimination based on sex, age, disability, sexual orientation or identity, race, ideology, religion, beliefs and/or family situation. Likewise, those responsible for access to and promotion of jobs will not be able to make their decisions based on sympathy, affinity, or personal interest. Professional growth will depend solely on the effort, involvement and quality of the work done, with meritocracy being one of the most important values for the Group.

The BETWEEN GROUP fully rejects any manifestation of physical, psychological, moral harassment or abuse of authority, as well as any other conduct likely to generate an intimidating or offensive environment with the rights of individuals. In this regard, the Group is committed to working to consolidate a work environment where dignity and non-discrimination are respected. All Group personnel have a responsibility to help ensure a working environment in which any type of harassment is unacceptable and undesirable and, in particular, management staff have an obligation to ensure with the means at their disposal that harassment does not occur in the organizational units under their responsibility.

The Group, aware of the need to protect the fundamental rights of all workers, has drawn up a Protocol for the prevention and treatment of cases of moral, sexual and gender-based harassment in the workplace, aimed at all employees and managers of the Group, and which is integrated into its Equality and Diversity Plan.

Internal conduct of the Group's staff

At the Group, we treat all our colleagues and business partners with dignity and respect. Teamwork and respect among the members of the Group are two of our core values.

All members of the BETWEEN GROUP are committed to carrying out their work with professionalism, honesty and integrity and respecting the procedures and protocols established for their job and functions. Based on this philosophy, the members of the Group:

- ☐ They shall not exceed their functions, making decisions or carrying out activities that are not appropriate to their position or job. They will always follow the *job description* of their job title.
- ☐ They will make correct use of the means and assets that the Group makes available to them for the development of their work.
- ☐ They shall be subject to the supervision and controls established by the relevant procedures.
- ☐ They will keep secret all the data and information they receive due to the performance of their position, and may not use them for their own benefit, nor provide them to third parties.

All members of the Group shall strive to promote a good, healthy working environment based on mutual respect, both in horizontal and hierarchical relationships. Under no circumstances shall disrespect or offenses to personal dignity, or humiliation of any kind be permitted. Likewise, any practice that constitutes any type of mental or physical harm will not be tolerated, and all forms of harassment and humiliating treatment are prohibited.

Physical integrity and sexual indemnity of the members

The Group will not tolerate any conduct that may interfere with the physical integrity and/or sexual integrity of the members of the Group, its clients or any other person in the Group's stakeholders. Acts that threaten physical and sexual integrity, and/or that are intended to cause physical harm or emotional trauma to a person, are expressly prohibited. Thus, the following can be classified as prohibited conduct, among others:

- ☐ Threatening behaviors.
- ☐ Verbal or written threats expressing intent to do harm.
- ☐ Abuse the physical attack.

- ☐ Verbal comments, such as racist remarks or sexist jokes or comments.
- ☐ Nonverbal visual displays, such as demonstrations or electronic acts with offensive photographs, videos, or gestures.
- ☐ Any act that causes fear in a person.

The Group and all its members shall ensure that they avoid any type of harassment or abuse of superiority. In this regard, the Group will appropriately investigate any communication that is reported to the *Compliance Committee*, the Head of People or any other responsible party, in relation to the conducts listed above. Appropriate measures will be taken, after investigation of the facts, against the person who has engaged in the prohibited conduct.

Respect for the Group's image and reputation

The BETWEEN GROUP conceives its image and reputation as one of its most valuable assets to preserve and enhance the trust of our customers, suppliers, staff, business partners and society in general, for this we maintain the integrity of our reputation through an adequate, clear and precise dialogue with our stakeholders. We also ensure that the Group's image and reputation are respected and correctly used by all persons linked to the Group.

Our reputation for integrity is greatly influenced by the information we provide to the public, and for this reason, it is important that all communications present a true and accurate picture of our business relationships. Only authorized persons may speak before the media or any other means of public dissemination, if they appear as members of the Group.

In this regard, the personnel and all members of the Group are committed to:

- ☐ Ensure the preservation of the reputation of the BETWEEN GROUP in all the activities carried out.
- ☐ Maintain appropriate conduct at all times when, with the prior authorisation of the responsible party, the brand, logos, designs, graphic badges and other assets - tangible or intangible - of the Group are used. In any case, its improper use must be avoided, in order to guarantee that the Group's reputation cannot be compromised or damaged.
- ☐ To monitor the correct and appropriate use of the Group's image and reputation vis-à-vis third parties.
- ☐ Be neat and meticulous in public interventions, in the media or in all types of conferences, talks, seminars or any other public event whenever you intervene as a member of the Group.

If you receive a request for information from the media, you should refer it to the People Department. If you receive a request from an analyst or a member of the Group's partners, or a request from an external legal representative or public body, you must refer it to the *Compliance Committee*.

We shall not take any of the following:

- Speak on behalf of the BETWEEN GROUP unless you are a designated spokesperson and are authorized to do so.
- Disclose any confidential information.
- Refer to the Group's customers, suppliers or partners without being authorised to do so.

Health and Safety of People

The Group considers safety in the workplace to be a priority, which is why it is committed to ensuring the safety, health and well-being of all its members and to complying with the rules and regulations relating to the prevention of occupational risks.

In this regard, the Group undertakes the following commitments:

- ☐ Integrate Occupational Risk Prevention and the promotion of health and well-being into all the company's activities and decisions, at all levels of the Group.
- ☐ To achieve a high level of health and safety, avoiding risks, assessing those that cannot be avoided, adopting the necessary measures to eliminate or reduce as much as possible the occupational risks generated in the development of our activities.
- ☐ Ensure compliance with the legal framework on Occupational Risk Prevention. Actions will be carried out to increase the degree of promotion of the health and well-being of the Group's members with health and safety campaigns, training, social, labour, ethical and environmental benefits, in addition to ensuring compliance with those other requirements related to the Safety, Health and Well-being of the workers to which the Group adheres.
- ☐ Extend the scope of the active commitment to the improvement of working conditions to the Group's customers by introducing preventive criteria in service contracts, enabling the necessary channels to ensure effective and efficient coordination of the activities carried out in their facilities.
- ☐ Establish and maintain close collaborative relationships with the different Public Administrations competent in the matter.
- ☐ Develop the training and information activities necessary for the implementation of a preventive culture, ensuring the competence of all the Group's employees in the field of Health and Safety at work.

9. Compliance Institutions

All of the Group's obligated entities undertake to comply with the rules set out above.

In addition, everyone will ensure the security of the Group's values and those of interested third parties. They will actively collaborate in the protection of people, assets, activities, information, *know-how* and reputation from threats that intentionally and illegitimately endanger them.

Failure to comply with this Code by any person linked to the company with an employment contract and regardless of their job category may be sanctioned in the manner described by the Group's Disciplinary System.

The ultimate responsibility for ensuring compliance with the Code of Ethics rests with the Board of Directors. The Group carries out this function through the *Compliance Committee*.

Before initiating any type of professional collaboration with a third party, the *Compliance Committee* will assess the compatibility of its policies and the Code of Ethics with the principles defended in this document. In the event of incompatibility or non-existence of a Code of Ethics or formal policies in the company, the third party interested in entering into a professional relationship with the Group must sign their adherence to this Code of Ethics and show their commitment to the principles defended in this document.

10. Control measures and sanctioning procedure

The control measures will contain procedures for collaboration with the justice system and the authorities in the event of detecting conduct that may be criminal on the part of a member of the Group or a third party with whom it is related.

Any failure to comply with the rules listed in this document will trigger the Group's sanctioning process, without prejudice to possible measures to report it to the courts, if the conduct is likely to be criminal or contrary to the law.

11. Dissemination and monitoring

The Group shall take appropriate measures to ensure that all its recipients are aware of the content of this Code of Ethics and that they understand its scope. This Code will be accepted by any person as a prerequisite for joining the Group. The Code of Ethics will be available on the intranet and on the corporate website, so that all persons who are or may be linked can have access.

This Code of Ethics will be mandatory for all levels of the company, and failure to comply with it will constitute a very serious infraction, which will be subject to the corresponding sanction.

The scope of application of the Code of Ethics may be extended to suppliers, customers, distributors, external professionals and representatives of the company, who will be asked to accept it or its own Code of Ethics.

All contracts signed by the company must include a clause that obliges the other company to comply with the law and with the ethical principles established in the company's code of ethics or in its own, of equivalent content. Failure to comply with these obligations will amount to a serious breach of contract.

12. Review and update

The *Compliance* Committee will periodically review this Code, taking into consideration the annual reports and suggestions of the members of the Group. The Group's General Management will be responsible for approving the proposed changes to this Code of Ethics.

The BETWEEN GROUP undertakes to carry out the corresponding training courses in order to ensure that all members of the Group are aware of the rules contained in this Code and any updates that may be given to it.

The Group shall establish appropriate control measures to periodically assess and manage risks related to the corporate activity, the people involved and the Group's reputation. Based on this analysis, the corresponding changes will be made to this Document.

13. Ethics Alert Hotline

All members of the Group undertake to adopt the necessary measures to detect and correct any action contrary to the law or the rules of this Code of Ethics. To make this effective, the Group will have an Ethics Alert Channel for the communication of breaches and possible acts constituting crimes. If you have any doubts about the Ethics Alert Channel, you can refer to the Ethics Channel Document or send your doubts to the *Compliance Committee*.

The bodies responsible for ensuring proper compliance with this Code are:

- *Compliance Committee*.
- Executive management.

The Group undertakes not to adopt or allow any form of retaliation, direct or indirect, against professionals who, in good faith, have reported through the Ethics Alert Channel an action contrary to the law or the rules of the Code of Ethics.

All internal institutions, staff and related third parties are expected to comply with the Code of Ethics, and if they have any doubts about how to act, they should raise them with the *Compliance Committee* or any member of the management team.

Appendix 1

Acceptance of the Code of Ethics

Mr/Mrs....., an employee of BETWEEN TECHNOLOGY S.L./HOPLA SOFTWARE S.L./USABGAMMA, S.L./DMD AERONAUTICS ENGINEERING S.L./DQS DYNAMICS QUALITY SERVICES CONSULTING GROUP, S.L., informs that he/she has been given the Code of Ethics, as well as all its annexes, and confirms that he/she has read it, and that he/she knows it, understands it, and accepts it.

Sincerely.

Signature:

Date:

Name and Surname:

N.I.F:

Department: