



everis



an **NTT DATA** Company

everis Group Code of Ethics and Professional Conduct



an **NTT DATA** Company

Introduction

NTT DATA CORPORATION's acquisition of the **everis** Group resulted in a partnership that has involved a merging of activities, an expansion of the service portfolio and greater international presence for NTT DATA. Its collaboration with everis allows NTT DATA to reinforce its expertise in the industrial sector and access not only large customers in Spain and several Latin American countries, but also multinational companies present in these markets.

In addition to the potential synergies with NTT DATA, **everis** will also be able to work more closely with NTT Group companies in order to expand its global services to customers.

Therefore, in addition to the principles stipulated in this Code, the principles set forth below will likewise be applicable, comprising NTT DATA's Global Compliance Policy.

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| Section | Global Compliance Policy |
| Introduction | <p><u>Being a Trusted Company</u></p> <p>Having the trust of customers, shareholders, suppliers and society at large in places where the company operates is essential for its sustainable growth. A trusted company is one that is aware of its corporate social responsibility (CSR) and meets and exceeds satisfaction expectations of customers and other stakeholders through positive communication.</p> <p>We also believe that this trust must be earned not only by complying with existing laws, regulations and contracts but also abiding by various international standards, including those dealing with human rights, running business practices transparently and under an umbrella of morality and integrity. Moreover, our mission is to create new "mechanisms" and "values" along with IT as well as ensuring richer and more harmonious societies; and our goal is to help solve the challenges facing both the planet and the various societies that share it.</p> <p>According to the above, all NTT DATA staff will act in accordance with this "Global Compliance Policy" and we will try our utmost to be a reputable company.</p> |

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| Application | All directors, managers and employees will fully understand this Global Compliance Policy and shall act as outlined below to achieve the goals stipulated herein. Directors and managers will take initiatives and encourage the development of the highest moral values in employees. |
| Principles | <ul style="list-style-type: none"> - We will comply with all applicable laws and regulations in the jurisdictions in where we do business, including international law, and will act with integrity; and - We will consider our corporate social responsibility and carry out our business correctly and transparently. |
| For Customers | <ul style="list-style-type: none"> - We will sign the necessary contracts with our customers and will supply systems and services in accordance with the relevant contract; and - We will meticulously handle customer information in accordance with contracts and applicable laws and regulations concerning personal data protection. |
| For Shareholders | <ul style="list-style-type: none"> - We will carry out solid corporate governance and will endeavour to increase returns for our shareholders; and - We will disclose information on said management in a timely and adequate manner so that it is transparent. |
| For Competitors | <ul style="list-style-type: none"> - We will not take any action that might hinder market competition, including defamation, dumping, cartels and other unfair/anticompetitive conduct, but rather will act respecting fair and free competition; and - We will protect our Intellectual Property rights while respecting those of others. |
| For Suppliers | <ul style="list-style-type: none"> - We will act with integrity, without abusing our competitive advantage; and - We will comply with applicable laws and regulations relative to transactions with suppliers, and we will respect contracts with the same. |
| For the Government | <ul style="list-style-type: none"> - We will not deliver any gifts or any other service against our Global Compliance Policy or applicable laws, nor will we carry out any act that may be suspected of corruption; and - We will not engage in any form of bribe to a public official |

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| | or administrative authority in any jurisdiction. |
| For the Company | <ul style="list-style-type: none"> - We will participate actively in corporate events, such as volunteering or other community activities in fulfilment of our responsibility as good corporate citizens; - We will respect the diversity of cultures and values, and contribute to the development of the societies in which we operate; and - We will reject any business relationship with anti-social forces. |
| For the Environment | <ul style="list-style-type: none"> - We propose IT solutions and systems that contribute to reducing the environmental impact; - We will strive to reduce the environmental impact of our business operations; - We will increase our knowledge of biodiversity and carry out activities to protect the natural environment; and - We will comply with environmental laws and regulations. |
| For Employees and Partners | <ul style="list-style-type: none"> - We will respect the individuality and personality of our employees; - We will respect human rights and not discriminate on grounds of sex, nationality, religion or belief; - We will not commit any act of workplace harassment; and - We will treat employees fairly and equally, and offer job opportunities according to individual merit, in a safe work environment free from violence, drugs and child labour. |
| As Employees | <p>Each employee:</p> <ul style="list-style-type: none"> - Will ensure that information security is maintained and shall not commit any breach of confidentiality, nor make commit any unauthorized access or any other illegal act; - Will comply with corporate policies and will not perform any act that conflicts with the interests of the company or |

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| | <p>implies a personal benefit to the detriment of the company;</p> <ul style="list-style-type: none">- Will not participate in any insider trading or operation;- Will not deliver to, or receive from, customers, suppliers or business partners any gifts or other service against our Global Compliance Policy;- Will not upload to social media platform any confidential information owned by the company, or any message that undermines the trust or the rights of any party; and- Shall immediately notify his or her superior, local compliance officer or whistleblowing channel, as appropriate, of any breach or possible breach of this policy or any other illegal act. The company will not take any action against those who report complaints in good faith through this channel. |
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Introduction

everis understands that its success depends on both its technological capabilities and the ability of its professionals to behave in accordance with principles of action based on the values that make up the company's culture.

For these principles to be actually operative, everis has identified the specific attitudes and conduct that must be observed in the daily activity of all professionals and people affected by the Application Scope of this Code.

The everis Code of Ethics and Professional Conduct reflects the company's attitude in terms of values, principles and standards that govern our internal relationships and our environment. It also aims to be a means of transmitting the ethical framework and corporate culture in all **everis** Group areas and legal entities.

As **everis** professionals, we must not only know and respect this code of professional conduct, but also accept it and monitor compliance.

The violation of rules contained in this Code of Ethics and Professional Conduct by people affected by it will be considered a breach thereof, and may result, according to the analysis of what happened, in the imposition of a sanction and/or the implementation of appropriate legal action.

In short, the **everis** Code of Ethics and Professional Conduct is one of the instruments which everis has chosen to reflect its attitude and culture and characterize its business performance. This culture is safeguarded by observing the standards and conducts specified herein.

Vision

everis is value-driven global company that stands out at the economic, ethical and emotional levels — a company where anything is possible

Beliefs

everis is a multinational group that believes above all in people and in their overall development, a place where people are not mere resources. **everis** is committed to the best talent and obtains high professional performance by creating a context of responsible freedom.

Values

Discerning generosity: sharing to do.

Responsible freedom: we do what we want.

Creative energy: we love what we do.

Coherence: we do what we say.

Transparency: we say what we do.



Scope of application

The values, principles and standards that comprise this Code are applicable to all employees, officers, directors, partners, shareholders, participants as well as collaborators, consultants, agents, trainees and/or other subcontractors, provided they act on behalf of or cooperate with **everis** and in general to any other people whose activity falls under this scope. In this document, we will refer to them all of them collectively as **everis** “professionals” or “employees”.

The Code of Ethics and Professional Conduct applies to all entities that make up the **everis** Group worldwide whose relationship for general information purposes is detailed in www.everis.com.

In countries where national or local applicable legislation requires the adoption of more restrictive rules or principles reflected in this document, policies which develop or supplement the content herein may be adopted.

Conduct Guide

Safeguarding the **everis** values requires establishing mandatory performance standards that define **everis** expectations from its professionals at work with regard to resource management and the business and social environment.

everis professionals have the responsibility to report unlawful, fraudulent, unethical and other conduct contrary to regulations and which in general contravene the provisions of this Code of Ethics and Professional Conduct or Corporate Policies and Procedures, following the Professional Alert System procedure defined herein.

Work-related conduct

1. Professional competence-professional services

everis is committed to equal opportunities in the professional development of all its employees. Specifically, **everis** encourages its professionals to develop their professional skills, strengthen their leadership and create value for the company and for its customers.

everis professionals are expected to commit to actively seek development opportunities in order to constantly update their knowledge and skills.

everis professionals should be involved in their own development, committing to invest the time, effort and resources required to develop and maintain the necessary skills and knowledge, using plans that the company provides to this end and taking part in them as expected.

This commitment must be driven by constant improvement of professional performance, in order to add value to all customers, shareholders and society at large.

As **everis** professionals, we should be demanding with ourselves and meet the excellence goals and performance standards set forth by the company.

Likewise, to facilitate the achievement of this objective, **everis** encourages professional guidance through a mentoring program.

2. Commitment to quality and innovation

everis regards ensuring the utmost satisfaction of all our prescribers and customers as one of the basic values of our culture, by providing high-quality products and services that anticipate and address their needs.

The **everis** quality methodology—established from a continuous improvement standpoint—establishes the measures that allow efficiently embedding quality in all company activities.

Pursuant to the principles that underpin our quality system, all **everis** professionals are expected to:

- Target their activity to meet customer needs and contribute value.
- Be committed to the daily practice of continuous improvement, forcing themselves to meet established quality standards.
- Perform actions to prevent operating errors and be geared towards error-free production as a way to maximize quality.
- Express active collaboration to eliminate processes that do not add value.

The concern and commitment to quality is the responsibility of all **everis** employees. To ensure this, we must improve knowledge and create a common business culture that allows us to adapt to new business demands while contributing to reduce costs and improve our efficiency and competitive position in the market.

The **everis** quality methodology is called COM (COrporateMethods), and it serves as a mechanism to articulate the experiences gained in real-life project situations. The goal of COM is to leverage these experiences through a set of easily applicable methods allowing us to provide our clients with the best possible solutions. In other words, it helps ensure quality solutions. This commitment is spelled out with global certification under ISO 9001:2000, ISO 20000 at the Madrid and Barcelona offices for the services area and CMMi-3 in all development centres.

Moreover, COM seeks to promote a culture of improvement at all organizational levels. Not surprisingly, our motto is "Improve to compete". After all, we firmly believe that in order to improve our productivity and consequently our competitiveness, we must capitalize on our experiences, our best practices and transfer them into corporate knowledge.

everis promotes and manages various initiatives to foster innovation among its employees.

3. Objectivity

everis professionals must be impartial and not be influenced by external factors or pressures (either economic, political, etc.) that could undermine the exercise of our professional activity. Thus, the application of objective criteria is essential in all work carried out at **everis**.

Professionals are required to demonstrate such impartiality to third parties.

As **everis** professionals, we undertake to avoid situations that can imply conflicts of interest or result in undermine loyalty to the company giving precedence to personal interests, damaging the objectivity, independence and impartiality with which we carry out our mission.

Conflicts of interest can be personal or professional. A personal conflict of interest will be deemed to occur when **everis** professionals' personal interests, investments or activities (including individuals and/or legal entities directly or indirectly linked to the same) collide with the interests of **everis** or the activities of these **everis** professionals on behalf of third parties. A professional conflict of interest will be deemed to occur when the service provision to a client makes it impossible, for any reason, to provide services to another customer. The appropriate measures will have to be established to address these conflicts. In the event of any conflict of interest, the **everis** professional in question should inform his or her manager immediately at the time it occurs and forward the relevant communication of the situation to the Compliance Area by sending a message to all.compliance@everis.com. The Compliance Area will transfer the same to the Legal Compliance and Prevention Committee ("Compliance Committee"). The Compliance Area or the Committee

will arbitrate the necessary measures to resolve the conflict, considering the circumstances of each case.

If any professional is involved in legal, criminal or administrative procedures involving penalties, which might affect the exercise of their duties as **everis** professionals, or if they accept public office, hold an administration or management position in other companies or acquire shares/units or any stake in a competitor, they must notify the company by following the same procedure described in the previous section.

For the purposes of this paragraph, directly or indirectly related persons are deemed to be any individuals that are related to any degree or others with similar relationship, as well as legal entities in which the professional or related persons own shares or hold a position that allows them to exert control or significant influence on financial or operational decisions.

4. Dedication and incompatibilities

everis professionals should be loyal and have full-time dedication (unless otherwise stated) to their activities at **everis**.

In no case are professionals allowed to provide services directly or indirectly to competitors, suppliers or customers, simultaneously as they work for **everis**, even if the company is unaffected. **everis** requires its employees to focus all their capabilities and effort to the company.

everis professionals cannot be subject to any situation of incompatibility, prohibition or conflict of interest, which prevents, restricts or limits the provision of services to and/or consulting for the company. Should any professional stop providing their services at **everis** to work for a competitor or an end customer, he or she undertakes to communicate the same time when he or she has proceeded to accept the offer from the competitor to his mentor and his or her manager.

Professionals may not use the name of **everis**, or mention their status as **everis** professionals, to perform operations for their own benefit or the benefit of associated third parties.

5. Communication

As **everis** professionals, we must keep informed of everything that generally refers to the company as well as matters affecting work status or the organizational unit itself.

This also includes the responsibility to seek appropriate advice on internal policies and, where appropriate, relevant legal requirements which may affect their activities, for example in issues related to conducts referred to in this Code, including regulations related to unfair or anti-competitive practices, intellectual/industrial property infringement, confidential/privileged information disclosure, accounting principles, financial reporting, etc.

everis professionals are expected to regularly and systematically use communication channels established with the aim of fostering a sense of unity within **everis** and build inter-company relationships to help achieve appropriate levels of communication among all stakeholders.

everis promotes teamwork and sharing knowledge and experience among all professionals in order to reinforce the multinational character of the company and to create competitive advantages in a global, complex and changing environment.

Every employee must share, as far as possible, their knowledge and experience to other people in the organization, as this information helps to increase the company's knowledge capital. Each **everis** employee should therefore undertake to support, assist and actively participate in any activity organized by **everis** for its employees so they can channel the transmission of knowledge. This is without prejudice to the obligations of secrecy and confidentiality established herein and in any other documents, as well as intellectual and/or industrial property rights belonging to or arising in favour of **everis** as a result of these activities and the implementation of related benefits and services.

Resource-related conduct

6. Information management

everis professionals must protect the company's interests regarding the confidentiality of its strategy, business plans, technology, organization, knowledge, marketing, etc., as well as ensure that customers, suppliers or any third parties related to **everis** receive confidential treatment of information received from or about them.

As data users, we must work on the principle that all information produced in **everis** is owned by the company and are required to ensure confidentiality indefinitely both as **everis** professionals and if we ever leave the company.

All those who generate information about the company must specify in each case the degree of confidentiality under which the information should be handled and filed, and what security measures that are applicable in each given case.

No **everis** professional may use, copy or disclose confidential **everis** information to a customer or third party, unless they first make sure to have the express permission of the decision maker. This prohibition also applies to any comments or discussion which **everis** professionals may have with persons outside **everis** or in the presence of others, including people from their circle of family and/or friends. Likewise, **everis** professionals may not collect or use confidential information foreign to the company except if duly justified, authorized and without any risk to **everis**.

everis professionals must act in good faith at all times. Their responsibility is to report any situation or event that, because of their importance or possibility of dissemination, could affect the organization, even when such an eventuality might seem remote.

7. Using everis assets

Each and every one of **everis** professionals undertake to make responsible, safe and efficient use of company assets. This includes protecting them from any harm and/or illegal or improper use, in accordance with the **everis**-approved policies and criteria.

everis provides a variety of resources (e-mail, computers, Internet, etc.) for its professionals' use for work purposes and in the exclusive interest of **everis**. With regard to other assets such as technological infrastructure, including computers, information systems, etc. as well as other assets including office buildings and furniture, houses and other material goods provided, are all owned by **everis** or may be subject to exploitation rights.

Therefore, **everis** can access any of these resources at any time, for control and monitoring (on a sporadic or recurring basis), in accordance with applicable regulations, according to the procedure of access to professionals' resources published

by **everis** and regardless of whether the employee accesses from the office or remotely, at the customer site or telecommuting from their own home.

When **everis** professionals use systems or access points as users, they must comply with and enforce all software licenses, copyrights and regulations which at any given moment are stipulated by intellectual and industrial property rights, as well as those related with the provision of information society or telecommunications services. Specifically, programs, content, materials or applications that can damage or harm **everis** or third party systems, or that do not have the relevant use licenses or generally whose use is contrary to any law or is prohibited and violates Corporate Policies and Procedures may not be installed or used in computer devices provided by **everis**.

Unless there is agreement to the contrary, **everis** will be the holder of rights of use and exploitation of any results from the work of its professionals in the course of their business.

The handling of information containing personal data which are accessible to **everis** professionals under the provision of their services is subject to the relevant regulations in force (Organic Law on Protection of Personal Data and regulations implementing it) as well as internal privacy, confidentiality and security of information policies published by **everis**.

everis professionals should only handle the personal data that are strictly necessary to do their work, and there must be a legitimate reason for using or sharing it, in accordance with the reasons specified below.

When professionals have access to personal data owned by clients, **everis** only handles the data following their direction. The company does not apply or use them for any other purpose other than the purpose specified in the contractual relationship entered into in this regard, and does not communicate them to third parties without prior authorization from the customer in legally enforceable terms.

We do not save any personal data beyond the term during which we are legally permitted or required to conserve them and insofar as everis may assume liabilities.

Likewise, **everis** has adopted organizational and technical measures to ensure the confidentiality, integrity and security of personal data processed in the exercise of their activities, in order to prevent their alteration, loss, transfer or unauthorized access.

8. Use of the everis brand

One of the most valuable assets for the company is the **everis** brand. All professionals must therefore take the utmost care in how it is used in conversations, reports, etc. and in how **everis** professional and business activities are implemented.

everis professionals must appropriately know and apply the **everis** Brand Manual in order to ensure a proper graphic use.

everis employees may not participate in destructive criticism or negative comments about the company itself and its customers, suppliers, shareholders and any other partners that could negatively affect the company's reputation.

everis' reputation is determined largely by how each and every one of its professionals acts. Illegal or inappropriate conduct by even one of our professionals can cause considerable damage to **everis**.

Distinctive signs (trade names, trademarks, domain names, etc.) used to distinguish **everis** belong to the company, so they may not be used by professionals at **everis** or third parties, customers or not, without the authorization of **everis**. When the use of these signs is authorized, professionals must comply with the strictest commercial standards, as well as legal, regulatory and professional ethics applicable in each case.

Any contribution made by **everis** in terms of sponsorship or in order to promote the **everis** brand may not be performed for the purpose of promising, offering or securing unjustifiable competitive advantages for **everis**.

Any mention of **everis** in any media (including social networks) should fully respect the content of this Code of Conduct and the **everis** internal procedures for using social networks. **everis** reserves the right to remove or request the removal of any contribution or publication which, at its discretion, violates this procedure or, in general, the content of this Code.

everis assumes no liability for the views and content published on its official profiles and offers no guarantee as to their being truthful, accurate or current.

Conduct related to the business environment

9. Relationships with customers and suppliers

everis should safeguard and protect its prestige. Thus, when circumstances suggest that maintaining a professional collaboration with customers, suppliers or any third party, by the circumstances surrounding it, could damage or negatively affect the reputation of **everis**, the relationship shall be terminated or, if applicable, become subject to review by the Compliance Committee.

everis professionals may not (directly or indirectly) accept, receive, offer, promise, grant or authorize the giving of money, favours, promises of benefits or any gift, hospitality or benefit to customers or suppliers, which by their value may be interpreted as anything other than a token or which could cause conflict between personal interests and the interests of **everis**, influencing in the professional's judgment in the exercise of their activity.

The attention received or given will be deemed to go beyond mere courtesy when it is different and greater than the attention usually given to others who have had contact with that customer or supplier. If in doubt, professionals should report to their immediate superiors any courtesy (gift, travel, etc.) whose estimated value could exceed the equivalent of one hundred euros (€100), as calculated by the customer or the supplier. Each office may prohibit or put a lower limit to the amount according to the trade rules and standards accepted in the relevant country.

In no case are professionals allowed to request suppliers or customers, directly or indirectly, for any gift or courtesy regardless of value.

All contracts for external supplies and services and, in general, all relations with suppliers and customers must be executed through transparent mediating procedures in keeping with advertising and competition guidelines.

everis has internal policies that define service and supply procurement processes, which are based on the principles of fairness, transparency and sustainability.

everis aims to carry out its activities on behalf of customers and suppliers who conduct legal business activities and whose funding or financing comes from legitimate sources.

10. Relations with Public Administrations and civil workers

As far as the relationship with public authorities and public sector entities is concerned, **everis** professionals must comply with and be subject to applicable relationship and procurement regulations, providing truthful information guided by principles of transparency, honesty and integrity.

No professional should, directly or indirectly, offer, promise, grant or authorize the giving of money, gifts, favours or contributions to any civil servant to obtain a benefit, grant, subsidy or advantage for **everis**. In particular,

any relationship subject to any hint of corruption that could imply preferential treatment, or may result in an influence, preferential treatment, or be linked to any extortion or bribery will be terminated or suspended.

The term “civil servant” is used generically to include officials, officers and employees of any government agency, semi-public agencies, agencies, government bodies, political parties and associations connected with the same, as well as any entities that receive public funding or subsidies.

11. Relationships with external professionals and competitors

everis promotes the development of professional relationships in the broadest sense with external individuals and organizations, provided they do not adversely affect the interests of the company and do not involve providing confidential company information or harm the company’s market competitiveness.

In order for **everis** to maintain its competitive position in the market, it is important to have relevant and updated information about the industry and competitors in the field, provided that it is obtained legally and by legitimate means.

For general information purposes, the following will be understood as malpractices: obtaining competitive information through industrial espionage, bribery, theft, wiretapping, interception of correspondence (physical or electronic) and intentionally communicate false information about competitors, their products or services.

12. Insider information. Relationships with the capital market, investment groups, stakeholders linked to everis and public regulatory bodies.

Inside information is material information which is not publicly known about a publicly traded company. Information is considered "material" if it can affect the market share price or if an investor, at his or her discretion, considers it important when deciding whether to buy, sell or hold a security. Inside information refers to financial conditions, such as improvements to achieve a revenue and earnings goal or the projection of future gains or losses in any company. Insider information also includes changes in strategy regarding a possible merger, acquisition or tender, new products or services, awarding contracts or other similar information.

Insider information is not limited to company information, but also includes material non-public information from third parties, such as on customers, suppliers, competitors and shareholders from the company itself.

Misuse of insider information occurs when an individual, who is aware of the material non-public information, sells securities/shares or transfers this information to others who take advantage of it. Whoever misuses insider information is breaking the law. Whoever reveals insider information to third parties for them to make use of this information is also acting against the law. For the purposes of this section, it is understood that "anyone who uses insider information" refers to civil servants, directors, employees, consultants and contractors of the company and its subsidiaries, as well as

immediate relatives or their relatives. Third parties who receive insider information from a person who misuses are also considered to misuse the information. When insider information is used, it should be understood to include material insider information from clients or suppliers.

The following is not allowed for those who make use of insider information:

- Buying or selling securities/shares, despite knowing the information.
- Sending insider information to third parties, including family members.
- Using the information when they have acquired it under a confidential relationship or allowing others to use it.
- Trading securities/shares from other companies, including securities from the company's customers or suppliers when they possess inside information about the companies in question.

Using insider information or helping others to use it, when a person is aware of it, has serious legal implications, even if there is no personal financial benefit involved. Professionals may likewise be under obligation to take appropriate measures to prevent the use of insider information by third parties. A person who knows and possesses insider information should not share or disclose the information with another company employee or a third party unless the employee or third party has the right, or need, to know such information in order to fulfil their responsibilities within the company. Under no circumstances may the person who knows the insider information make it available to relatives or acquaintances (personal or professional).

Pursuant to applicable legislation, including local applicable law in those countries where everis operates, severe sanctions may be applied to those who misuse insider information. Likewise, those who engage in a legally stipulated infringement (for example, in Spain, Article 285 of the Criminal Code and articles 271 and following, mainly related to articles 226 and 227 of the Securities Market Law) are also subject to administrative sanctions.

Relations with the capital market, investors and financial analysts will be channelled exclusively through the **everis** financial department, specifically from the investor and financial institution relations area.

This area will restrict and validate the reliability of information that may be created, discussed or analyzed, projecting a possible exchange or subsequent disclosure, either in favour of the aforementioned stakeholders or in response to legal requirements.

Regulation on insider information that could have a significant effect on everis' financial position or relations with these investors and stakeholders will likewise be considered.

Relations with the media will be analyzed through the company's Marketing and Communication Department.

Conducts related to work and social environment

13. Respect for the principles of non-discrimination and equal opportunities, as well as a safe working environment

everis considers that every professional must be treated with respect and dignity, with no discrimination based on race, sex, creed, national origin, religion, sexual orientation or any other physical, mental or social condition. Based on these rights, **everis** commits to maintain and protect—using all measures at its disposal—a work environment where dignity and fundamental rights are respected. Specifically, **everis** promotes equal treatment for men and women as regards access to employment, training, promotion and working conditions. All **everis** professionals are equally entitled to a proper working environment, free from bullying problems. People who suffer bullying are likewise entitled to receiving aid, and the appropriate corrective, disciplinary measures must be implemented to prevent such situations from recurring.

everis firmly rejects any violence, abuse of authority, harassment (whether physical or psychological) or any other conduct creating an intimidating or offensive environment at work—considering such conduct unacceptable and intolerable, regardless of the identity of the victim or harasser. There are policies that safeguard equality and non-discrimination among employees and foster awareness of these rights. Specifically, the People and Personnel Management areas are equipped with an internal action protocol published by **everis** which allows identifying workplace harassment—both moral and sexist—in order to address a discriminatory situation and minimize the consequences, guaranteeing the rights of individuals by applying the corresponding management procedures, involving the mediator and the prevention and control commission.

everis people management practices include, in addition to Equality Plans, criteria which favour equal opportunities and objectivity in evaluation to recognize talent and encourage meritocracy. **everis** objectively, transparently and practically evaluates the performance of its professionals, in compliance with policies that rigorously measure professional performance.

For the same reasons, **everis** selects its employees as needed to fill certain positions, taking into account each candidate's personal and professional merit.

At **everis** we are aware of the importance of eliminating barriers between our professionals, eliminating hierarchies and promoting the autonomy, independence and freedom of each of our professionals in performing their work. **everis** will ensure that all workers have the relevant work authorizations and visas to follow the immigration regulations in force in each country.

everis likewise establishes and promotes a workplace health and safety policy published by **everis**, detailing the measures available from all those stipulated by applicable legislation.

Respect for privacy rights is one of the principles governing **everis**' commitment to its professionals, so that their personal data will not be processed for purposes other than those legally or contractually provided for in the scope of **everis**' activities.

Finally, **everis** encourages its professionals to give the necessary attention to their obligations outside of work (family, recreation, culture, etc.) because they contribute to the integral development of the person and the necessary balance between professional and personal life. To ensure this, the company has a work-life balance program and encouraging, whenever possible, telecommuting and flexibility in the exercise of functions.

14. Commitment to talent

everis promotes the personal development of its employees as much as possible in areas where cooperation is possible, beyond the strictly professional obligations.

In this regard, **everis** supports its employees' participation in courses, conferences and seminars, encourages the publication of articles, studies and books as well as teaching courses on any subject in which they have special knowledge and interest (provided they do not include company or end-client confidential or restricted information).

15. Social commitment

everis appreciates it when professionals belong to and participate in non-profit institutions involved in public interest and welfare initiatives, provided that these activities are conducted in their free time.

everis promotes this commitment through the **everis** foundation, created in 2001 in order to cooperate with society through academic institutions, developing human capital and disseminating knowledge about information technology and enterprise applications.

The main objective of this foundation is to create, promote and foster education, teaching, training, research and retraining (at all levels and degrees) in the areas of Business and Information Technologies.

16. Commitment to the environment

everis is driven by respect for the environment and continually improves its environmental performance through an environmental management system based on ISO 14001 followed by its employees, customers and suppliers.

Preventing pollution by minimizing the consumption of natural resources, responsible disposal of waste and recycling of materials are among the main objectives set by **everis** as a socially responsible company.

17. Control of compliance with this Code

Any professional may make requests for information or clarification, or other matters relating to the scope of compliance with this Code, by sending an e-mail to the Compliance Area at all.compliance@everis.com, for management and processing before appropriate bodies.

Furthermore, **everis** offers all professionals a whistleblowing system. This system and its internal procedures are available to all **everis** employees on the global corporate Intranet.

The Professional Alerts System is a transparent channel for confidentially communicating those actions/conducts or circumstances that may involve a non-compliance or an act contrary to the law, this Code of Ethics and Professional Conduct or any **everis** internal policies, protocols and procedures. Therefore, the company grants employees the right and obligation to communicate any actions/conducts that can broadly harm **everis** (including reputation), its professionals or others with whom **everis** interacts.

Only the Chairman of the Audit Committee, the Director of Internal Audit, the Head of Legal & Tax Advisory, as well as the CRO, if any, will have access to the Professional Alert System, in an absolutely confidential and secure manner. They will analyze the information received in each case and will determine its origin, substantiation and resolution, which, where appropriate, will involve the appropriate investigation to determine whether such assumptions constitute an irregularity or violation.

everis undertakes not to take any form of retaliation, directly or indirectly, against professionals who have communicated through the Professional Alert System, except in cases of false accusation.

18. Disciplinary regime

The violation of the contained in this Code of Ethics and Professional Conduct by **everis** professionals will be considered a breach thereof and may result in the imposition of sanctions and/or the adoption of appropriate legal actions.

When in the context of proceedings resulting from a complaint filed through the Alert System, the Compliance Committee determines that an **everis** professional has carried out activities contravening the provisions of this Code of Ethics and Professional Conduct, or the corporate Procedures and Policies, he or she will submit it to the Audit Committee for a decision on the application of disciplinary measures pursuant to the infringement and sanction regime specified in the collective agreement or applicable labour legislation, without prejudice to any other civil, criminal or administrative liability which may be enforceable.

No **everis** professional may require another, regardless of the exact hierarchical position, from committing an act that contravenes the provisions herein or in general improper or illegal.



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Likewise, no professional may justify conduct contrary to the Code of Ethics and Professional Conduct by claiming to act under orders or instructions from a superior.