

Code of ethics



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1. Opentrends' code of ethics

1.1. Ours values

The principles governing the content of this Code of Ethics are based on the values that define the culture of the company, and are focused on a professional activity in which honesty, respect, transparency and quality of service prevail.



People-Centric Culture

#PeopleCentric. We are a genuinely human organization. We are concerned about everything that makes people feel cared for.



Empowered Talent

#EmpoweredTalent. We want our people to grow and develop with us, thus building high-performance multidisciplinary teams.



Passion for Innovation

#PassionForInnovation. We are brave and passionate. Innovation is our motivation and we are not afraid of any challenge.



Creative tech with impact

#OpentrendsImpacts. Our goal is to generate a positive impact on people, clients and society through creativity and technology.

1.2. Scope

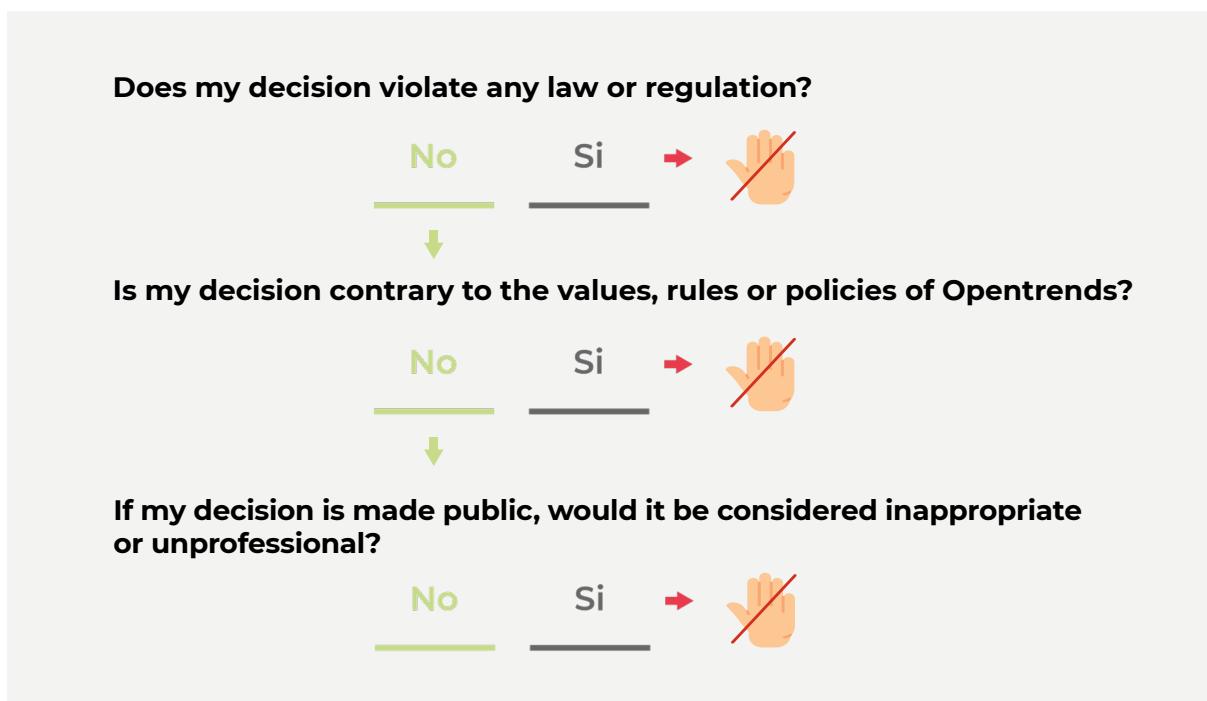
Everybody who is part of Opentrends, its customers and suppliers, as well as all those who collaborate with the company are subject to the principles of this Code of Ethics, and to its guidelines for behavior and action.

For this reason, from the moment that any of the aforementioned groups become part of the company or, by any means, have contact with it, they will be bound by the principles of this Code of Ethics.



1.3. What are my duties?

Please, think about this before **deciding**:



If you still doubt, please contact compliance@opentrends.net.

As an OPENTRENDS employee you must:

- Know and understand** our Code.
- Act according to our Code and consult in case of doubt.** The Code does not cover all the situations that an employee may face, but it does establish clear guidelines for conduct. In case of doubt, you should consult your manager or the person responsible for the Code.
- Do not tolerate behaviors that are not in accordance with the Code.** In the event of detecting a situation contrary to the Code, even if it is not within the scope of your responsibility, you must communicate it through the Speak Up channel.

1.4. Speak Up

WHISTLEBLOWING CHANNEL

At Opentrends, we guarantee an effective communication. We want everybody in the company to feel comfortable when it comes to report any action that they believe may go against our Code.

Therefore, if you observe any actions that violate, or seem to violate, our Code, you must communicate it through the **Speak Up channel**.

Speak Up is a web-based channel. In order to guarantee anonymity, it is a tool independent from Opentrends. It is totally prohibited to retaliate against people who use this channel to communicate any situation that goes against the Code.

It can be used by the internal staff of the company, clients, suppliers and other people who collaborate with Opentrends.

How to use Speak Up?

1. You can send directly through this channel the information you want to share, in a clear and concise way.
2. This tool is managed by an external, specialized and impartial person.
3. The confidentiality and identity of the complainant, and of any third party mentioned in the complaint, is guaranteed.
4. There will be a respond to the file within a period not exceeding three months.

In addition to this anonymous tool, **you can also contact the following people:**

- Your direct manager
- The person in charge of Área de Personas
- The person in charge of Compliance
- The company's management

This tool fulfills the legal requirements of the jurisdictions that regulate the company's internal complaints.



2. Relationship with our coworkers

2.1. Respect, harassment and anti-discrimination

Everybody in the organization acts according to the principles of equal opportunities and respect for diversity.

Discrimination in the workplace based on gender, sexual orientation, race, nationality, religion, beliefs, disability, age, identity, language or any other personal or social circumstance is not tolerated.

Any form of harassment, whether sexual, work or personal, as well as hostile, humiliating or offensive environments, should also be avoided

2.2. Work-life balance

At Opentrends, we seek to reconcile work commitment and personal life as much as possible. Thus, we establish different measures such as flextime policies, the possibility of teleworking, special permits according to needs, etc.

We also promote the right to [digital disconnection](#) once the work day is over.

We will implement different measures to maintain work-life balance, adapting ourselves to future new circumstances.





2.3. Objectivity in selection processes, recruitment and promotion

Our selection, assessment and promotion policies guarantee the same access opportunities to both posts and internal promotion. Decisions will always be based on the professional qualification and capacity required for the positions, fostering inclusion and diversity.

2.4. Health and safety in the workplace

Everybody at Opentrends is committed to respect the health and safety regulations at work, as well as to make a responsible use of their equipment, watching over their own safety and, in general, the safety of anyone that may be affected by their activities.





3. Relationship with the company

3.1. Use of business resources

At Opentrends, we are committed to making good use of the material and immaterial goods provided to us, and to return them in good condition when required. Email and Internet should be efficiently used for the performance solely of professional duties.

We must take measures to protect the assets and resources of the company, or of any third party, that are under our care from loss, theft or unauthorized disclosure.

3.2. Intellectual and industrial property

We commit to not misuse or abuse the image of the company outside of it, respecting the principles stipulated in this document at all times.

When performing works for Opentrends, or on its behalf, we must respect the intellectual property rights of our customers, competitors, business partners and suppliers. The terms and conditions of open source products must always be checked, in order to ensure their lawful use.

The ideas, concepts, works, developments or finds generated by Opentrends' staff while working for the company remain being property of the company, or of its clients, according to the terms of any signed contract.



3.3. Confidentiality and data protection

Information is one of the most important and essential assets for the company's activity.

We treat both internal and external information in a lawful, loyal and transparent manner, fulfilling laws and regulations in force.

Likewise, all data that can be accessed because of the position, regardless the level of responsibility, must be used solely and exclusively within the work environment, keeping due confidentiality.

3.4. Treatment of conflicts of interest

We have the obligation to promote the interests of Opentrends, and the prohibition of personally benefiting from opportunities arising within the framework of our professional activity.

If we find ourselves in a situation of conflicting interests, we must abstain from taking part or participating in the negotiation or operation.

We must not make use, for our own benefit or that of third parties, of the privileged information that we have as a result of our professional activity.

3.5. Acceptance of gifts or personal benefits

We cannot accept, request or ask for any type of payment, gift, reward, commission, present or similar from third parties with whom we establish commercial, labor or business relationships, in order to profit ourselves.

More specifically, **it is not allowed** to give or receive gifts or presents of any kind that:

- ✗ May influence commercial relationships, whether with customers or suppliers, so that any advantage, different treatment, expectation business, influence capacity or obligation (direct or indirect) to contract with them is generated.
- ✗ Are contrary to the law, public order and any legislation of the normative order.



However, some **exceptions** are established:

- ✓ Its monetary value does not exceed € 200.
- ✓ They are usual gifts of our field, promotional objects of trade fairs, electronic objects usual on the sector.
- ✓ Invitations to trade fairs, events, courses, business meals, professional meetings, etc.
- ✓ Christmas gifts, as long as they fall within the usual practice or customs of the sector.
- ✓ Given the impossibility or the objective difficulty of returning it.
- ✓ Due to the institutional, symbolic or protocol nature of the gift offered.

Any action apart from what is strictly stated in the previous points, such as trips paid by third parties, attendance to special commercial events or with a value exceeding € 200, will be considered as unauthorized practices.

As described above, given the situation in which a third party offers or gives us a gift or similar, we must:

1. Immediately reject it.
2. Communicate expressly and immediately to the third party that it is not possible to accept the gift, present, invitation, etc. and return it.
3. Inform our manager of any gift received that does not comply with the limitations contained in this policy. In addition, we must notify the person in charge of the Compliance area.

3.6. Free competition

It is forbidden to discredit competitors, their products or services, or to manipulate, hide or present a distorted view of reality to obtain illicit profits.

We are committed to promote free competition for the benefit of consumers, and to fulfill antitrust regulations. We must avoid any behavior that constitutes, or may constitute collusion, abuse or restriction of competition.

3.7. Suppliers

Opentrends' suppliers are selected following objective and transparent processes. It is a necessary requirement that their services fulfill the guidelines and principles detailed in this Code.





4. Relationship with clients

4.1. Transparency

We strive to maintain an open and transparent relationship with our clients, guided by ethical standards that reflect our values and always based on mutual trust.

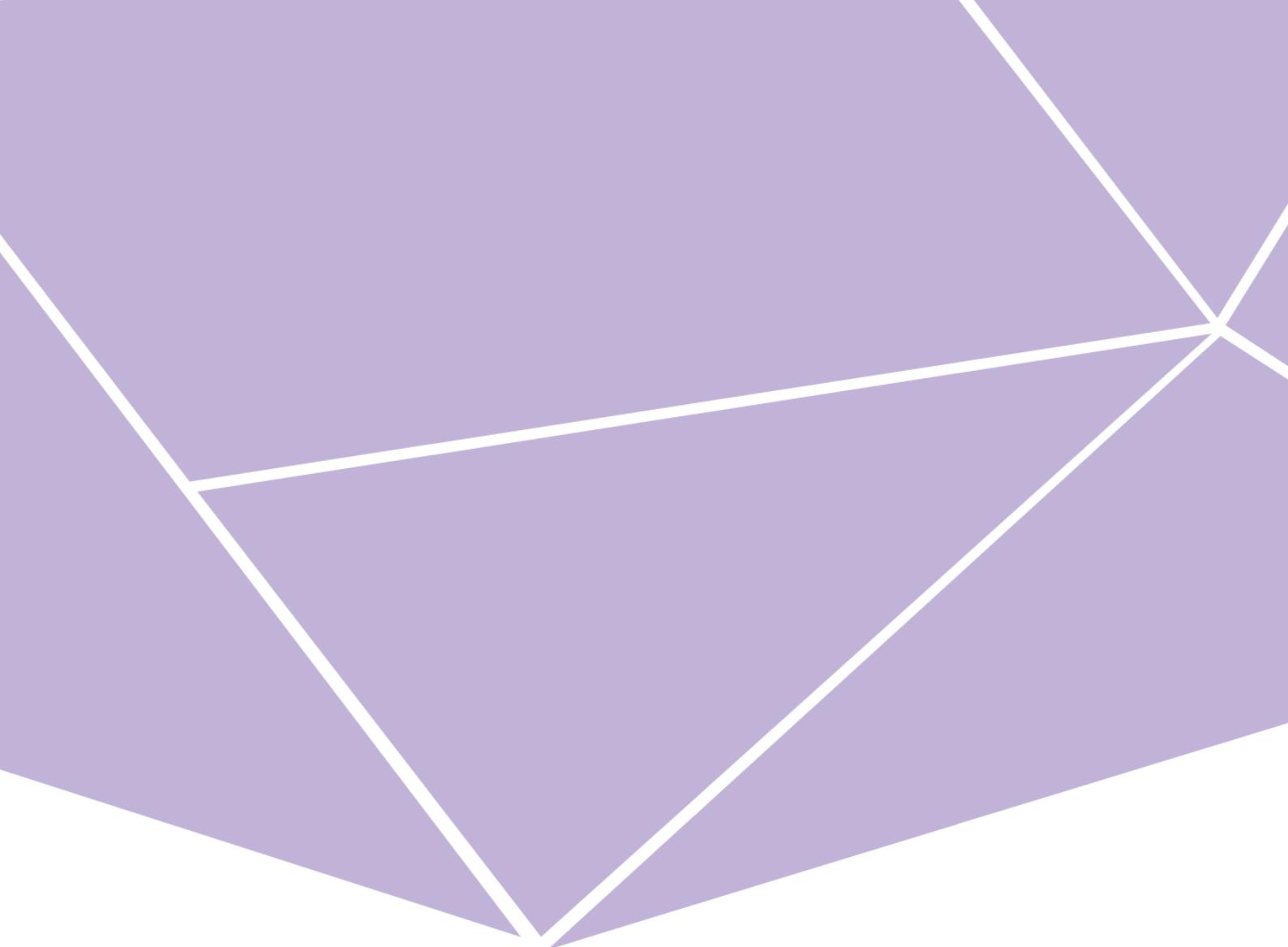
We know the products and services that we sell, and we clearly and truthfully provide their features and risks.

We offer and advertise our products and services without messages that may result misleading or false, or that may omit relevant information.

4.2. Quality

We are committed to offer a high-quality human and professional service to our clients, providing them with our technical knowledge, personal treatment and dedication, as well as with the defense of their interests.





5. Relationship with society



5.1. Anti-corruption policy, money laundering and terrorist financing

We do not tolerate corruption, nor the acceptance or offering of bribes, either by us or by third parties on our behalf.

This is why we will not try to influence government officials, business partners, consultants or decision-makers by offering bribes, giving or promising valuable items, doing improper favors or threatening.

We will prevent any funds of illicit origin from being used as payment for our products and services, as well as making payments to companies that may be suspect of carrying out, or financing, illegal activities.

All our financial records, as well as tax filling, will be made in accordance with the legislation in force, without any alteration that may lead to financial fraud.

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5.2. Human rights

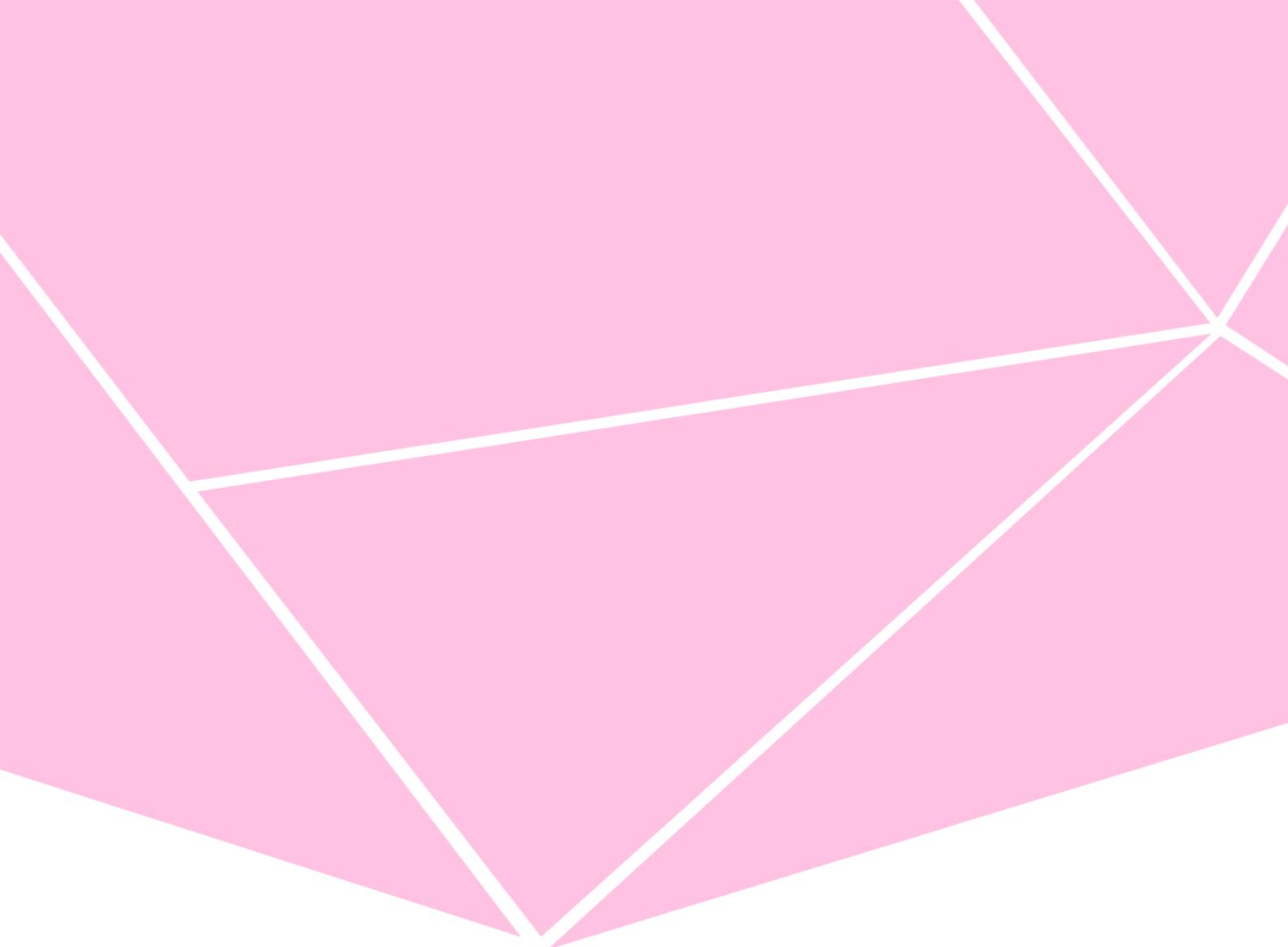
As an entity adhered to the UN Global Compact, we comply with and respect its decalogue, in accordance with the following principles:

- ✓ **Human Rights:** Companies and their members must support and respect the protection of internationally proclaimed human rights, and make sure they are not accomplices in human rights abuses.
- ✓ **Labor Rights:** Companies must defend the freedom of association and the effective recognition of the right to collective bargaining, the elimination of all forms of forced or compulsory labor, the effective abolition of child labor and the elimination of discrimination in matters of employment and occupation.

5.3. Environment

We undertake initiatives to promote greater [environmental responsibility](#) and encourage the development and spreading of environmentally friendly technologies. Our commitment is endorsed by the achievement of the ISO 14.001 certification..





6. Validity of the code of ethics



6.1. Respect for the legislation in force

We have a clear commitment to respect laws, both labor and civil. That is why we must know all the regulations that affect our job, and if not, request the necessary information to undertake our tasks under the protection of the law.

This Code of Ethics is included in the Crime Prevention Manual (CPM) as part of compliance with Organic Law 5/2010, of 22 June, which introduces for the first time in the Penal Code an express regulation on the criminal responsibility of legal persons for crimes committed on their behalf by their representatives, de facto or legal managers, and employees.

The CPM is governed by the Penal Code, the Code of Ethics by the principles and values of the company and the Speak Up Channel by Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019, on the protection of persons who report breaches of Union Law. All of this forms the basic pillars of the company's crime prevention program.

6.2. Entry into force

This Code of Ethics entries into force from the moment it is published on the Opentrends website and Intranet, and will remain in force until its next review.

6.3. Penality regulations

In the event that an unfulfillment of any point of this Code is proven, the appropriate steps will be taken, which may lead to legal sanctions in the working environment.