



Ethical Code

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1. DEFINITION

Principles that must guide and orient the professional behavior of TRUSTCLOUD employees in the context of their work and professional activities and obligations. This code of ethics reflects TRUSTCLOUD's commitment to act in accordance with values that guarantee responsible behavior and with absolute respect for current legislation in all the Company's relations with its own employees, its customers, its suppliers, its shareholders and society in general.

2. ADDRESSEES

The TRUSTCLOUD code of ethics is addressed to all employees, who must be aware of and accept its contents and agree to comply with it at the time of joining the Company. Suppliers, subcontractors, customers and any third parties that maintain legal relations with TRUSTCLOUD - hereinafter referred to as stakeholders - shall be covered by the principles of this code insofar as they apply to them.

3. BASIC PRINCIPLES

- **Respect for legality:** Business and professional activities shall be carried out in strict compliance with the laws in force in each of the places where they are carried out.
- **Ethical Integrity:** The business and professional activities of TRUSTCLOUD and its employees shall be based on the value of integrity and shall be conducted in accordance with the principles of honesty, avoidance of all forms of corruption and respect for the particular circumstances and needs of all parties involved. TRUSTCLOUD will promote among its employees the recognition and appreciation of behaviors that are in accordance with the principles set forth in this Code.
- **Respect for Human Rights:** All actions of TRUSTCLOUD and its employees shall scrupulously respect the Human Rights and Civil Liberties included in the Universal Declaration of Human Rights. These basic principles will be translated into the fulfillment of the following commitments

4.EMPLOYEES

Compliance with current legislation: All employees shall ensure compliance with the laws and regulations in force in the place where they carry out their activities. Likewise, they shall at all times respect the commitments and obligations assumed by the Company in its contractual relations with third parties.

Information policy: All employees shall be informed of and accept the principles and criteria on which the Company bases their professional development, the effectiveness of their management and the strengthening of their commitment to the Company's goals and objectives.

Commitment to Training: Each employee must attend to their own training, using all the means that TRUSTCLOUD makes available to them, in a constant commitment to themselves and the Company aimed at updating and increasing their training, in order to achieve their full professional development and the achievement of their personal goals.

Reconciliation of family and professional life: The balance between work obligations and personal and family life is achieved through a human resources policy that generates measures that make it possible to reconcile the commitment to the Company with the time necessary for the development of a personal life project.

Professionalism at work: TRUSTCLOUD employees will act in the exercise of those competencies that are attributed to them by reason of their positions, putting into practice criteria that lead to the greatest efficiency, at the lowest possible cost, always following the guidelines that, according to their respective technical training, are, in each case, the pertinent ones.

Management style of managers and executives: The attribution of managerial competencies at all levels of our Organization will also entail the assumption of the responsibilities derived from decision-making. The exercise of management will also be a training school, an exercise of constant evaluation, a stimulus for talent and a channel for the professional development of our employees, through the design of career and succession plans for management positions. TRUSTCLOUD's executives and managers are responsible for the motivation and communication among the members of their teams, promoting a participative management style that encourages communication, delegation, initiative, teamwork, results orientation and collaboration with others.

Principle of non-discrimination and equal opportunity: Commitment to creating a work environment where all employees are treated with fairness, respect and dignity, paying special attention to promoting equal opportunities and treating all employees fairly and without prejudice, eliminating any type of discrimination, whatever its cause or origin.

Respectful and non-harassing work environment: Reject any manifestation of harassment, abuse of authority, as well as any other conduct that may generate an intimidating, offensive or hostile work environment, favoring a pleasant and safe work environment.

Use and protection of company assets: TRUSTCLOUD provides its employees with the resources necessary for the performance of their professional activity. All persons working in the Company undertake to make good use of the material and immaterial means made available to them.

IT and Communications Resources: IT and communications resources, and especially e-mail and the Internet, must be used solely and exclusively for the performance of employees' professional duties, and their use may be subject to monitoring or audits at any time.

Financial Resources: Employees shall be responsible for the proper use of the financial resources provided to them. In the exercise of the functions of their positions, TRUSTCLOUD employees may not request or receive, by themselves or through an intermediary, any gift or present intended to influence their decisions, and must inform their superiors of any proposal they receive in this regard.

Conflicts of interest, business opportunities and other activities: TRUSTCLOUD employees are required to disclose to their respective superiors the existence of any conflicts of interest that may exist between themselves - or persons related to them - and the Company.

Business opportunities: Employees may not take advantage, for their own benefit or that of a person related to them, of information or business opportunities of which they have become aware in the course of their work.

Confidentiality of information: All TRUSTCLOUD employees are obliged to protect confidential or reserved information, whether technical, financial, commercial or of any other nature, and not to use it outside the scope of their employment relationship, nor disclose it to third parties without the prior written consent of the company, except for those requests for information that are required by judicial or administrative authority in legal terms. Those employees who, because of their high responsibilities, have access to particularly sensitive information may be required by the Company to sign specific confidentiality commitments as an annex to their main employment contract. The Company shall guarantee to its employees, suppliers, customers and any third parties related to it the faithful compliance with the regulations on data protection, adopting the pertinent measures in its Organization so that such regulations are fully effective.

Intellectual Property: The right to use or exploit, in industrial or commercial form, any innovations or inventions produced by TRUSTCLOUD employees in the course of their work, and which give rise to trademarks, patents, invention models, copyrights, industrial designs, etc., shall belong to TRUSTCLOUD, which shall protect them under the terms established by law.

5. CUSTOMERS

Confidentiality: It will be guaranteed that the information that TRUSTCLOUD possesses, derived from its relationships with its customers, is duly protected by the legislation on protection of personal data.

Quality of services: The satisfaction of our customers for the services provided by our companies constitutes the priority objective of our business activity. All employees must be aware that the success in the relationship with customers lies in the correct provision of the services offered. To this end, and in order to achieve the committed quality levels, TRUSTCLOUD provides its employees with the necessary means for the development of their activity.

Relationship with customers: All relationships that TRUSTCLOUD maintains with its customers shall be duly documented in the legally appropriate form and expressed in clear terms that allow the rights and obligations arising from such relationships to be precisely determined.

6. SUPPLIERS AND SUBCONTRACTORS

Selection policy: The selection of suppliers and subcontractors will be made with criteria of transparency, objectivity and free concurrence, so as to guarantee the quality of the good acquired or the service assigned and the best economic conditions, valuing, especially, the technical and financial solvency of the supplier and subcontractor and the experience gained from previous relations with them.

Confidentiality: The knowledge of protected information to which TRUSTCLOUD has access, as a result of its relationship with suppliers and subcontractors, will have the guarantees provided in the Data Protection Act.

Relationship with suppliers: Employees must comply with and respect the Company's internal regulations when approving suppliers, as well as in the awarding of work, supplies and services. The Company shall take all necessary measures to prevent personal interests of its employees from having a decisive influence on all of the above processes. TRUSTCLOUD continuously evaluates its suppliers and subcontractors for compliance with environmental, quality and occupational safety requirements.

7.COMMUNITY

Environment: TRUSTCLOUD will seek the greatest possible respect for the environment in which it carries out its activities and will minimize the negative effects that, eventually, these could cause. It will make available to its employees the most appropriate means to do so. TRUSTCLOUD will also contribute to the conservation of natural resources and areas of ecological, scenic, scientific or cultural interest. To this end, it will establish best practices and promote among its employees the knowledge and use of them. TRUSTCLOUD is committed to strict compliance with applicable environmental legislation.

Social Commitment: TRUSTCLOUD is committed to acting in a socially responsible manner, in compliance with the laws of the countries in which it operates and, in particular, assumes responsibility for respecting cultural diversity and the customs and principles in force among the people and communities affected by its activities.