

# Movilok Interactividad Móvil Code of Ethics, Conduct, and Responsible Practices

## 1. Introduction

*The Code of Ethics, Conduct, and Responsible Practices of Movilok Interactividad Móvil SL (hereinafter "the Code") establishes the behaviors that must be adopted by all staff of Movilok Interactividad Móvil SL (hereinafter "MOVILOK" or "the company"). The purpose of the Code is to guide all members of our organization towards professional, ethical, and responsible behavior.*

*The Code must be applied by all our staff, although it may also be extended to suppliers, partners, or other legal entities, in part or in its entirety, depending on its applicability.*

*MOVILOK and by extension all its employees, must comply with the legislation in force in the countries in which it carries out its activities, as well as the regulations required by its clients. They must also comply with the company's rules, procedures, and instructions. For this, MOVILOK should disseminate this documentation to those who need to know it and train its employees diligently for compliance.*

## 2. Integrity with Our Employees

*MOVILOK will not employ workers younger than the minimum working age stipulated.*

*No person employed at MOVILOK will be subject to discrimination based on race, physical disability, illness, religion, sexual orientation, political opinion, age, nationality, or gender.*

*MOVILOK prohibits all forms of physical, sexual, psychological, or verbal harassment or abuse of its employees, as well as any other behavior that could generate an intimidating, offensive, or hostile work environment.*

*MOVILOK recognizes the right to unionization, freedom of association, and collective bargaining of its workers.*

*Furthermore, all employees are responsible for strictly complying with all Occupational Risk Prevention procedures and for ensuring their own safety and that of their work colleagues.*

*Consumption of substances that could affect the proper fulfillment of professional obligations is prohibited.*

### **3. Integrity with Our Clients**

*MOVILOK has a fundamental commitment to its customers: to deliver products and services of high quality, ethically and responsibly produced.*

*MOVILOK commits to providing truthful information to its customers about the services or products it offers. MOVILOK employees must promote the products clearly and without misrepresenting their conditions or characteristics.*

*Employees must maintain a respectful and non-discriminatory behavior in their relationships with clients.*

### **4. Market Integrity Practices**

*MOVILOK competes in the market fairly and legally. For this reason, it commits to avoid unfair or illegal practices.*

*Employees will not request and will reject information about competitors obtained improperly or by violating confidentiality.*

*Employees will avoid disseminating malicious or false information about competitors.*

*Employees will avoid sharing or exchanging any price, cost, or other commercially sensitive information.*

*Cash payments or payments into unusual accounts will be subjected to special control and supervision.*

*Payments will not be made to accounts opened in territories classified as tax havens, and those made to organizations where it is not possible to identify the partner, owner, or ultimate beneficiary.*

*The selection of suppliers will be governed by criteria of objectivity, merit, and transparency and in accordance with the procedures established by MOVILOK.*

*No employee of MOVILOK may offer, grant, request, or accept, directly or indirectly, gifts or gratuities, favors or compensations, in cash or in kind, that may give rise to suspicions of corruption, whether from customers, suppliers, competitors, governments, administrations, public officials, or organizations.*

*MOVILOK allows the exchange of attentions and gifts in the professional environment only when reasonable and within normal business relations.*

*MOVILOK employees will not make facilitation or streamlining payments.*

*In relation to public aid, MOVILOK employees will use truthful information to obtain it and will ensure that it is used for the purpose for which it was granted.*

*MOVILOK employees must avoid situations that may pose a conflict between their personal interests and those of the company. They may not use their position in the company or information obtained by their status as a MOVILOK worker to obtain property advantages or personal business opportunities.*

*MOVILOK employees will not use the company's goods and services for their own benefit.*

## **5. Confidentiality of Information and Personal Data Protection**

*MOVILOK will adopt the necessary security measures to protect the security and confidentiality of the information against internal or external risks of access and manipulation. MOVILOK personnel are obliged to comply with all procedures established to ensure information security.*

*MOVILOK personnel are obliged to protect the information and knowledge handled and generated in the company, which will generally be considered confidential. Also, they will not use confidential information from another company without its due written authorization.*

*Information of any kind should only be used for the purpose for which it was obtained.*

*MOVILOK commits to protecting personal data and complying with current regulations. When personal data is processed by third parties, they must contractually guarantee compliance with all security measures established in the legislation.*

*When labor or professional activity with MOVILOK ceases, the information that is of internal use, confidential or reserved will be returned by the professional or the employee, who will remain subject to the duty of confidentiality.*

## **6. Protection of Intellectual and Industrial Property**

*MOVILOK protects its own and others' intellectual and industrial property, including that of the public domain. Personnel must respect both their own and third parties' industrial and intellectual property and comply with the conditions of use of any material used. **Social and Environmental Commitment***

*MOVILOK is committed to minimizing the environmental impact in the development of all its business activity. It will internally promote the use of less polluting practices and encourage its staff to adopt habits in line with its environmental commitment.*

## **7. Disciplinary Regime**

*Violations of the Code of Ethics may put MOVILOK at risk and may therefore lead to disciplinary measures. Violations will be individually analyzed by the Management Committee, which will establish specific measures.*

*Also subject to sanctions are those who act negligently in the detection of infractions, those who hide information or hinder the investigation of an infraction, and hierarchical superiors who respond with reprisals to the person or persons who report a possible infraction.*

*Madrid, 31 de agosto de 2020*

*Movilok Management Committee*