



AD MAIOREM

Code of Ethics

We establish a single reference framework to comply with the rules, regulations and values that regulate our business behavior, with the main objective of providing engineering and innovation solutions for highly technological sectors.

ADMAIOREM

Code of Ethics

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1. General provisions

1.1. Introduction:

At Ad Maiorem we offer engineering and innovation solutions for sectors with great technological potential such as Aerospace, Defence, Railway, Industrial, Oil & Gas and Telecommunications. The usual practice of our activities is based on respect, transparency, and compliance with current regulations and laws applicable to the business and social environment in which we operate.

In this sense, we consider it vitally important to develop, comply with and periodically review this Code of Ethics, a document that establishes the principles of behaviour of our firm, which, based on the commitment of our managers and employees, will serve as a means of counteracting any type of inappropriate conduct and/or illicit act by any member of the team and/or professional linked to Ad Maiorem that could potentially damage our image and reputation with our clients, suppliers, strategic allies, government institutions and public opinion in general.

We promote a participative work environment, free of any type of discrimination, in which our collaborators are involved with the company's objectives, as well as with the appropriate mechanisms to achieve the fulfilment of these objectives; we guarantee that, within the framework of their responsibilities, all members of our team comply with the indications of this document, and with providing the highest level of professionalism available to satisfy each of the requirements entrusted to them, thus ensuring the quality of our services and the satisfaction of our clients.

1.2. Implementation

By means of this Code of Ethics, Ad Maiorem seeks to establish a single frame of reference, which sets out the rules of conduct to be adopted by the main recipients and/or stakeholders of our company, among which we highlight the clients, managers and employees, suppliers and subcontractors, and any other third parties providing services to Ad Maiorem and/or acting wholly and/or partially on its behalf, all identified under a legal and/or contractual relationship, regardless of the geographical territory in which they carry out their activity.

We urge that the compliance with this Code of Ethics is mandatory, and that it is applied to each of the activities we carry out and the environments in which we operate.

By virtue of the foregoing, we therefore make it clear that Ad Maiorem Consulting Services S.L. (Spain), Ad Maiorem Italia S.r.l. (Italy), and Ad Maiorem Netherlands B.V. (The Netherlands), are independent legal entities forming a corporate group.

1.3. Basic ethical principles

At Ad Maiorem we base our actions on the fundamental principles of social good, care, equity, integrity, justice, fairness, loyalty, legality, freedom, environment, respect, responsibility, security, tolerance, transparency and truthfulness, as mechanisms that reinforce the proper functioning and reliability of our management, as well as our corporate image and reputation.

1.4. Our culture

1.4.1. Mission:

To provide our clients with innovative solutions for the management of technological projects of high social impact, providing them with the advice and skills necessary for the creation of value and the success of each of their actions.

1.4.2. Vision:

To be a strategic reference in technological innovation at an international level, committed to the satisfaction of our clients and the development of our team.

1.4.3. Values:

- **Honesty:** We act with sincerity and truthfulness in all our processes. We manage our business with transparency and committed to joint development.
- **Talent:** We not only provide knowledge and experience, but we also work with empathy and positivity to ensure that individual excellence contributes to overall success.
- **Innovation:** We play a leading role in the design and development of new technologies. We use our experience to implement solutions at the service of our clients and society.
- **Projection:** We think about the future. We want to go further and be the link between people, new ideas and great possibilities.
- **Ethics:** We abide by rules and principles that govern respect for people, the environment and diversity. This is our approach to building strong and trusting relationships.

2. Conduct rules and corporate management

2.1. Public aid and subsidies

At Ad Maiorem, our managers and/or employees are obliged to explain and proceed with absolute truthfulness during all the stages of the process of application and management of public aid and/or subsidies for the study, execution and/or implementation of technological projects related to the areas in which we develop.

At Ad Maiorem we are against any type of fraudulent act, and therefore, in order to maintain our transparency with regard to the application for public aid and/or subsidies, we are committed to providing truthful, timely and accurate information about our management.

We adhere to the fulfilment of each of the conditions related to the granting of public aid and/or subsidies that we have applied for and/or in which we have been beneficiaries. To this end, we maintain timely and appropriate communication with the institution or body that grants the public aid and/or subsidy, accrediting the information and documentation necessary for the same during all the stages of the process (application and/or obtaining, project execution, results reports, among others).

Within Ad Maiorem, any natural and/or legal person involved in an application process for public aid and/or subsidies must take into account that the company categorically prohibits the following actions, whether these

are personal and/or group actions:

- Falsifying, altering or omitting any data or information required in the process of applying for or obtaining the public aid and/or grant.
- Breach or alter any of the conditions laid down or form and/or procedures with regard to the implementation of the project for which the public aid and/or subsidy was granted.
- Falsifying, altering or omitting any data or information about the project under implementation in the reports and/or monitoring reports submitted to the corresponding public body.

Ad Maiorem is committed to providing complete, timely and truthful information on the executive management and administrative conditions to be fulfilled as beneficiaries of public aid and/or subsidies.

Also, to provide information on the development of the project for which the public aid and/or subsidy is requested, the plans associated with it, the resources to be used and other elements of which the project is made up.

Likewise, at Ad Maiorem, we assure that the economic amount coming from the public aid and/or subsidy, will maintain the exclusive and unique purpose of covering the costs arising from the execution of the subsidised project, not being able to be used totally and/or partially for other purposes unrelated to the objective for which it was granted. The project must be carried out in accordance with the indications, plans and objectives presented to the institution or body granting the public aid and/or subsidy.

2.2. Good tax practices

At Ad Maiorem we are committed to complying with tax and fiscal obligations in each of the territories where we carry out our business activity. Our actions, in this case, are in line with policies that allow us to manage the fiscal and tax matters linked to our company in a responsible manner and in accordance with the regulations in force.

We seek to ensure the highest standard of legal certainty and control with respect to our decision-making on issues related to the tax environment, which is why our managers and/or employees involved in activities and/or decision-making in the tax field must adapt and respond to their management with legality, complying with all established internal procedures, keeping the team and superiors involved in these tasks informed, in order to promote actions to prevent tax risks arising from the activities carried out by Ad Maiorem.

We extend our commitment not to use structures with non-transparent tax purposes, as well as not to operate in tax havens without apparent need. We also commit to cooperate with the Tax Authorities in force, with whom we intend to establish and/or strengthen relationships based on transparency, trust, reciprocity, good faith and respect for the law.

2.3. Unfair competition

At Ad Maiorem we are committed to compete in the markets avoiding disloyalty and complying with the regulations, rules and principles applied to the defence of free competition, defending equal conditions and avoiding any action that may impede healthy competition in any of the markets in which we participate.

We urge our managers and/or employees not to take any action that could affect the free and healthy competition of Ad Maiorem in the framework of their business activities.

In this way, Ad Maiorem takes a prohibitive attitude towards behaviours that restrict and/or limit free competition, the most relevant of which include collusion to the detriment of competing companies, misuse of relations with supervisory bodies, regulators and/or other governmental institutions, misuse of confidential information and misleading advertising.

2.4. Information confidentiality

At Ad Maiorem we are obliged to protect the confidential and/or reserved information entrusted to each of the members of our team, in accordance with the position they hold (technical, financial, commercial or others that form part of our business structure).

Such information must only be used for purposes related to the employment relationship that Ad Maiorem maintains with its managers and employees, and may not be disclosed to third parties without prior notice and written consent of the company, except in the case of requests for information required by law, where the recipient is a judicial, administrative, regulatory and/or supervisory authority.

In the case of team members who, due to their functions and responsibilities, have access to highly sensitive information for Ad Maiorem, they must sign specific confidentiality commitments which will be annexed to their employment contract.

2.5. Conflict of interests

At Ad Maiorem, all its managers and employees are obliged to inform the company, through their manager and/or immediate superior, about the existence of conflicts of interests and/or warn or anticipate possible conflicts of interests that may have arisen both internally, between team members, and/or externally, with people linked to the company and/or the team, and/or various organisations.

We understand as persons linked to Ad Maiorem and/or its team:

- The spouses of our managers and employees or a similar relationship of affectivity, if applicable.
- Ascending or descending siblings, aunts, uncles, nieces, nephews, cousins of the team member and his/her spouse, if applicable.
- Legal persons and/or organisations managed by a person member of the team and their principals mentioned above.

Ad Maiorem's officers and/or employees who for any reason are involved in and/or affected by a conflict of interest situation shall refrain from participating in the process and/or decision regarding the same. In any resolution or decision on a conflict of interest situation, it is understood that the interests of Ad Maiorem will always be prioritised.

By way of example, the situations that may give rise to a conflict of interests include the following:

- Participating in decisions affecting the business with parties with whom the directors and employees, or a close relative thereof, have an interest or from whom a personal interest may arise.

- Use of the company's name for personal gain.
- Proposing or accepting agreements from which personal benefits can be derived.
- To execute deeds, sign contracts and in general carry out any behaviour that, directly or indirectly, may cause damage to the company, also in terms of image and/or credibility in the markets where we operate.

2.6. Legal compliance

At Ad Maiorem, all its managers and employees ensure compliance with the legislation and regulations in force in each place where we carry out our activities. We reject any type of illegal practice and corrupt action, committing ourselves at all times to

legality and good business practices. Likewise, we adhere to the respect of each of the obligations and commitments assumed by Ad Maiorem in its contractual relations with third parties.

It is strictly forbidden for the directors and/or employees of Ad Maiorem to collaborate with third parties and/or be part of acts that violate the laws established for the correct development of the company; it is also forbidden for them to participate in actions that, within the legal framework, compromise the principle of legality and/or damage the reputation of Ad Maiorem in the public opinion in general.



2.7. Combating money laundering

At Ad Maiorem we support the fight against money laundering and any irregularities that may arise from its practice, including those arising from illicit and/or criminal activities. We extend this commitment to the different interest groups with whom we interact (clients, suppliers, providers, competitors or authorities, among others).

We adhere to and commit ourselves to comply with all legal provisions and regulations regarding anti-money laundering, which may be applicable and helpful for its eradication.

2.8. Preventing corruption

At Ad Maiorem, its managers and employees are not allowed to participate directly and/or indirectly in any type or act of corruption such as bribery, extortion, falsification of public adjudications, influence peddling, illegal or ill-intentioned use of confidential information, among others, that may arise from the relations that Ad Maiorem maintains with its various stakeholders and public opinion in general.

Likewise, any natural and/or legal person with whom Ad Maiorem maintains a contractual relationship may not accept by any means and from any sender, any type of payment, gift or other similar that are not considered lawful, morally and ethically permitted.



2.9. Principle of non-discrimination and non-harassment

At Ad Maiorem we act fairly and without prejudice, and we prohibit any kind of discrimination, regardless of its cause or origin (trade union affiliation, disability, age, language, nationality, opinion, sexual orientation, economic position, race, religion, gender, and/or any other personal and/or social condition and/or circumstance).

Likewise, we reject any type of action that may involve any type of harassment, be it sexual, moral, labour and/or other actions that may be detrimental to a person's dignity. We advise our managers and employees not to engage in conduct that could be classified as harassment, abuse of authority, or any other conduct that could create an intimidating, offensive or hostile work environment.

2.10. Relations with governments and authorities

Ad Maiorem will not support or finance, directly and/or indirectly, any political party, its candidates and/or representatives.

We are committed to ensuring that our relations with authorities, regulatory, supervisory, administrative or similar bodies belonging to the public sector are conducted on the basis of principles of transparency and good practice, seeking at all times to cooperate with the authorities, fulfilling our obligations and in accordance with what our possibilities allow.

At Ad Maiorem, all its managers and employees are obliged to inform the company, through their boss and/or immediate superior,

if they have received requests for meetings and/or confidential and/or non-routine documentation from authorities, regulatory, supervisory, administrative or similar bodies belonging to the public sector, in order to clarify any type of controversy that may arise, safeguarding, at all times, the transparency and good faith of the company.

2.11. Environmental friendliness

At Ad Maiorem we carry out our activities in line with respect for the environment and compliance with the standards of the current environmental regulations stipulated in each of the places where we have a business presence.

We are committed to sustainable development, which we base on the prompt identification of the effects generated by each of the activities we carry out, with the aim of identifying, managing and minimising the risk and environmental impact caused as a result of the execution of these activities.

Our managers and employees are conditioned to fully comply with environmental legislation as indicated in the performance of their duties, to prioritise preventive rather than corrective criteria and to raise environmental awareness among other team members at all times.

2.12. Respect for human rights and adherence to the UN Global Compact

At Ad Maiorem we are guided by and committed to the respect of human rights and public freedoms, as outlined in the framework

of our adherence to the 10 Principles dictated by the United Nations (UN) Global Compact, derived from the Universal Declaration of Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, the Rio Declaration of the United Nations Conference on Environment and Development, and the United Nations Convention against Corruption, which are mentioned below:

- **Principle 1 (Human Rights):** Businesses should support and respect the protection of internationally proclaimed human rights within their sphere of influence.
- **Principle 2 (Human Rights):** Companies must ensure that they are not complicit in human rights abuses.
- **Principle 3 (Labour Standards):** Companies should uphold the freedom of association and the effective recognition of the right to collective bargaining.
- **Principle 4 (Labour Standards):** Companies must support the elimination of all forms of forced and compulsory labour.
- **Principle 5 (Labour Standards):** Companies should support the elimination of child labour.
- **Principle 6 (Labour Standards):** Companies should support the abolition of discrimination in respect of employment and occupation.
- **Principle 7 (Environment):** Companies should maintain a precautionary approach to environmental challenges.
- **Principle 8 (Environment):** Companies should encourage initiatives that promote greater environmental responsibility.
- **Principle 9 (Environment):** Companies

should encourage the development and diffusion of environmentally friendly technologies.

- **Principle 10 (Anti-corruption):** Companies should work against corruption in all its forms, including extortion and bribery.

2.13. Corporate Social Responsibility (CSR)

At Ad Maiorem we are committed to the principles framed in the good practices of Corporate Social Responsibility (CSR), by means of which we actively and voluntarily promote and contribute to the socio-economic development of each of the places where we have a legal presence and/or business participation.

As part of our investment in developing talent in the technology sector, we have policies that ensure the participation of our managers and employees in long-term innovation projects. Through this, we promote an accessible work environment, free of discrimination, aligned with current legislation and ensuring high quality standards in the positions we offer.

2.14. Information security and data protection

EAt Ad Maiorem we have defined a set of rules that regulates the management of information security and data protection, which is included in the "Confidentiality and Professional Secrecy Agreement", a document of mandatory compliance, which includes the principles of action with respect to this activity. It is signed by mutual agreement during the recruitment process of a new resource, and is equally



applicable to all managers and/or employees of the company.

2.14.1. Respect for intellectual property

At Ad Maiorem we prohibit the reproduction, transfer, copying, distribution, modification, plagiarism, total and/or partial, of solutions, software systems and/or computer products, methodologies, industrial plans and designs, trademarks, trade names, patents and/or other similar products owned by Ad Maiorem and/or third parties (natural person or entity outside Ad Maiorem, whether or not they have any relationship with our company) without express authorisation by means of an official document that accredits it.

Likewise, at Ad Maiorem, we prohibit any type of installation and/or execution of systems, programmes and/or files that could violate and/or suppress the protection of information security and data protection, respectively.

2.14.2. Use of corporate resources

In order to comply with information security and data protection management, corporate resources (applications, e-mail, internet, mobile, laptop, network, systems, among others) may be monitored and supervised continuously and/or whenever Ad Maiorem deems it appropriate.

If any breach and/or misuse of the company's corporate resources is identified, the company may take any legal, technical and/or contractual action necessary to safeguard the protection of its rights.

2.15. Occupational health and safety

At Ad Maiorem we are committed to protecting the health and physical integrity of

all the managers and/or employees who form part of our team. To this end, we have an occupational health and safety policy based on strict compliance with the current regulatory training and occupational risk prevention framework.

In order to comply with this policy, we provide our managers and/or employees with the necessary resources for the proper performance of their duties, ensuring them a healthy and safe environment. For their part, our managers and/or employees undertake to strictly observe and comply with all occupational health and safety regulations, as well as to make good use of, and maintain in good condition, the equipment assigned to them for the performance of their work, ensuring their own safety and that of all persons who may be involved in and/or affected by their activities.

At Ad Maiorem we will also ensure that our suppliers carry out these actions in correct compliance with the legal regulations applicable to them in terms of health and safety at work and environmental protection.

2.16. Transparency of economic-financial management

At Ad Maiorem we are committed to the transparency of our economic-financial management, a principle that must govern transversally to any of the actions carried out by the company, and which we extend to the basic aspect that must govern the actions of each of our managers and/or employees with respect to their professional and work activity within Ad Maiorem.

For these purposes, the annual accounts shall faithfully reflect the economic and financial reality of Ad Maiorem, in accordance with accounting principles and international financial reporting standards, whenever applicable.

According to the above, no director and/or employee shall distort and/or conceal any information in the company's accounting reports and/or records; furthermore, according to the corresponding functions of each member of the team, it is stipulated as their sole responsibility to ensure that the facts relating to the management of the company's operations are correctly and truthfully reflected at the accounting level.

All transactions must be based on and supported by adequate and verifiable documentation. The principles of accounting management are correctness, completeness and transparency, in full compliance with current regulations. It is strictly forbidden to provide incorrect, erroneous and/or confusing information, whenever it violates the integrity of the communication of information in contravention of this Code of Ethics and the economic-financial regulations of Ad Maiorem.

2.17. Truthfulness, cordiality and good faith

At Ad Maiorem we are committed to ensuring that all the actions and behaviour of our managers and/or employees, in the performance of their duties, are inspired by transparency, fairness and mutual respect, as well as both formal and substantive legitimacy, in accordance with current regulations, with the aim of protecting the company, its assets and image in the eyes of public opinion in general.

In particular, Ad Maiorem's managers and/or employees reject the following behaviours:

- The pursuit of personal or third party interests to the detriment of social interests.
 - Abusive exploitation, personal or third party interest, of Ad Maiorem's name and reputation.
 - Business opportunities acquired and learned in the performance of their assignment or function.
 - The use of goods and equipment available to Ad Maiorem personnel in the performance of their duties for purposes other than those related to the company.
- Furthermore, the managers and/or employees of Ad Maiorem do not accept or make, for themselves or for third parties, pressures, recommendations or denunciations that could be detrimental to the company, to themselves and/or to third parties. Likewise, they do not make any undue promises and/or offers of any kind.



3. Main target audiences and/or stakeholders

3.1. Clients

In order to justify the sale of our services, at Ad Maiorem, we use truthful information, in accordance with the client's needs. We guarantee that all information that Ad Maiorem possesses and/or acquires throughout the relationship with its clients will be duly protected by the laws in force regarding information security and data protection.

Ad Maiorem is committed to the fulfilment of all previously established agreements, as set out in the contract and/or framework agreement which, for this purpose, has been made known and signed by both parties as a sign of acceptance. If, due to unforeseen circumstances, it is not possible to fulfil the commitment made, it is Ad Maiorem's obligation to give a satisfactory response to the clients. In the same way, no reprisals will be taken for any reason when a client generates a complaint and/or claim with respect to one of our managers and/or employees, as long as he/she has failed to comply with the aforementioned.

In order to create and maintain a commercial environment based on trust, credibility and transparency, at Ad Maiorem, we promote, recommend and encourage our clients to comply with the commercial, accounting, fiscal and legal framework applicable to the market or markets in which we have established a contractual relationship. Consequently, in the event of identifying that a client is a party to and/or is directly and/or indirectly involved in



illegal acts, Ad Maiorem may take the decision to terminate the commercial relationship with the implicated party, reserving the right to detail the causes if it deems it appropriate.

On the other hand, our clients must be aligned with the respect for human rights and the 10 Principles dictated by the United Nations (UN) Global Compact, as well as comply with the laws, regulations and requirements applicable to the management of our services.

3.2. Managers and/or employees

At Ad Maiorem we are committed to creating a space to develop the skills of our team in the most important technological innovation environments in the world. All our managers and employees are treated with dignity, fairness, equality, impartiality and respect, the main objective being to encourage and promote, based on meritocracy, various opportunities for personal and professional growth. We assume professional assessment criteria that have the exclusive purpose of measuring the effort, performance and talent of our managers and employees, regardless of personal circumstances and/or specific conditions.

Every member of our team knows and applies the regulations and legislation in force in the market or markets in which we carry out our activities; therefore, we respect the commitments and comply with the obligations and contractual relationships that these require with our various stakeholders, where applicable.

In the same way, all Ad Maiorem managers and/or employees accept and are in line with the principles and criteria on which the

company bases its activities, in the efficiency of its management, in the generation of value in favour of clients and in the fulfilment of the objectives established.

Our commitment also includes the principles relating to the reconciliation of work and family life, as well as those relating to constant training, where we offer various possibilities for your managers and/or employees to increase and/or update their knowledge in a specific field, acquire skills in the use of specific tools that will help them to develop their work activities, achieve their full professional development and personal objectives simultaneously; and in the use of technology as a means of socialisation and increase the quality of life of all of us.

3.3. Suppliers and subcontractors

At Ad Maiorem, the selection of suppliers and subcontractors will be carried out under strict criteria of transparency and objectivity, as well as in accordance with the real needs of the company. At all times we will seek to guarantee the aspects of quality, experience, price, technical and financial solvency of the supplier and/or subcontractor, in order to ensure the best conditions for Ad Maiorem, without harming the interests of the supplier and subcontractor, or any third party, whatever their function may be.

We guarantee that all information that Ad Maiorem possesses and/or acquires throughout the relationship with its suppliers and subcontractors will be duly covered by the laws in force regarding information security and data protection.

Ad Maiorem managers and/or employees

involved in the selection of suppliers and subcontractors must enter into commercial relations with them, respecting and complying with the principles of good faith and good customs, granting work, projects, products and/or services only with the certainty that they are indispensable for the fulfilment of the commitments and actions that the company must manage.

Ad Maiorem, in these cases, will provide the necessary means to prevent personal interests coming from its managers and/or employees from decisively influencing all the above mentioned processes, carrying out a continuous evaluation of its suppliers and subcontractors on the fulfilment of quality, occupational safety and environmental requirements.







4. Dissemination and communication

Ad Maiorem disseminates and communicates the content of this Code of Ethics to all its stakeholders and public opinion in general, who will be timely and adequately informed of its existence, advising, exhorting and/or obliging them to comply with it, depending on the case and the type of relationship that exists between the company and the interested party (labour contracts, commercial contracts, contracting processes and approval of suppliers and subcontractors and/or other forms of adhesion that may result in a business relationship).

4.1. Dedicated channels

At Ad Maiorem we make available two channels that allow you to communicate and/or report, in absolute confidentiality, all types of conduct and/or illicit behaviour, irregularities and infractions that may be considered serious for the correct exercise of the principles established in this Code of Ethics. Likewise, for any type of query and/or doubt regarding the interpretation and/or application of this Code of Ethics, as well as its legal and regulatory compliance:

- **Web page** (form):

<https://www.admaiolem.com/en/contact-code-of-ethics>

- **email:** info@admaiolem.com



4.2. Whistleblowing

Ad Maiorem is committed to examining and analysing in detail all communications and/or reports of alleged violations of this Code of Ethics. Our clients, managers and employees, suppliers and subcontractors, and public opinion in general with whom Ad Maiorem maintains any kind of relationship, should feel free to express their fears and/or draw attention to actions with possible ethical and moral implications, which could result in personal harm and/or damage to the company's image.

Irregular conduct may only be reported and/or denounced in relation to the objective expressed in this Code of Ethics, and never referring to areas other than and/or the private life of individuals and/or confidential information of third party companies.

The communication and/or complaint must indicate at least the identity of the person or persons involved in the irregular conduct, and

the fact or facts of which the irregular conduct consists, indicating precisely what has been the fault and/or violation of the regulations, which are the subject of this Code of Ethics. Likewise, whenever possible, supporting documentation should be attached to accredit the irregular conduct. At Ad Maiorem we will acknowledge receipt of communications and/or complaints within a period not exceeding seven (7) working days from receipt of this Code of Ethics.

We will not tolerate, under any circumstances, retaliation against any person who wishes to communicate and/or report to us an event that he or she considers reportable, and which is stipulated in this Code of Ethics. Furthermore, under no circumstances will we threaten or take any adverse action and/or discrimination against whistleblowers.

5. Consequences for non-compliance with the provisions of this Code of Ethics

5.1. Penalties

The provisions of this Code of Ethics are an integral part of the contractual obligations assumed with our various stakeholders, whether they are clients, managers and employees, suppliers and subcontractors, or subjects that maintain any kind of relationship with Ad Maiorem.

No unlawful, illegitimate or even improper behaviour can be justified or considered less serious. Violation of the rules and regulations linked to the present document may constitute a breach of contractual obligations, legal consequences, and claims for damages in favour of Ad Maiorem.

6. Application monitoring

In order to ensure compliance with this Code of Ethics, the General Management of Ad Maiorem, has convened a Committee composed of people responsible for the areas of Administration, Marketing and Recruitment.

The Ethics Committee shall be responsible for carrying out the following tasks:

- Interpretation and resolution of issues raised with respect to the Code of Ethics.
- Receipt and evaluation of communications and/or complaints related to the application of the Code of Ethics. Specifically, ruling on cases of labour proceedings for violation of the Code.
- To process the communications and/or complaints received, if appropriate, until a final or conclusive resolution is issued.
- Propose to the General Management all types of modifications, clarifications, new rules and policies that the Code of Ethics may require in order to implement improvements to it.

7. Approval and validity

The Code of Ethics has been approved on **September 15, 2021** by the General Management of Ad Maiorem, who will indicate at the appropriate time the periodicity in which this document will be reviewed and updated.

ADMAIOREM



Code of Ethics

Ad Maiorem consulting. Innovation and technology consulting services

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The information contained in this document is mandatory compliance. It contains principles and values that should serve as a guide for all managers and employees of the company in the exercise of the functions of their job, extending to compliance with the legal regulations indicated therein, to suppliers and subcontractors, and other third parties that provide services to Ad Maiorem and/or that act totally and/or partially on its behalf, all identified under a legal and/or contractual relationship, regardless of the geographic territory in which they carry out their activity.

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

Francesco Cognata
CEO

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