

SGCP04 R01.00 – CODE OF ETHICS

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Ever since its creation, **CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA** has provided added value, innovation in Andalusia based on excellence, subject to the foundational purposes and activities set in the Corporation's bylaws, within the applicable legal and regulatory framework. This distinguishing fact is the will of the Board that it is an objective to be met by all internal staff and external partners that have some link with the Corporation, all oriented to the delivery of work of the highest quality.

1. Object.

In a single document, The Code of Ethics and Business Conduct or Code of Good Practice includes the principles, criteria and rules of conduct by which all who are part of **CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA**, must abide by in order to carry out their function, constituting, consequently, a fundamental pillar of its Corporate Social Responsibility.

The purpose of this Code is to set the principles and values that we must comply with in **CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA**, in order to ensure ethical and responsible behaviour in the professional development of its activity, while establishing the principles and values of business ethics and transparency.

Such values improve the reputation of the entity, grant and transmit unity and coherence, feeling of belonging to the Corporation and govern employee conduct when dealing with entities with which it operates in compliance with its purposes.

This Code of Ethics is complemented by all the internal regulations and regulatory compliance, as well as the Protocols and internal action plan procedures that determine, with greater precision, the actions in the daily evolution of **CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA**.

2. Scope and extent of application.

This Code of Ethics applies to all those who are part of **CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA**, regardless of their position or link with the Corporation, these are:

- Companies that, in the different categories statutorily foreseen, belong to the foundation.
- Trustees and members of the Governing Bodies of the entity.
- Employees.
- Suppliers.
- Clients.
- And other stakeholders with dealings with the foundation

The above necessarily entails that **CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA** promotes and encourages among the recipients of this Code of Ethics the adoption of behavioural guidelines coinciding with those defined therein.

3. Principles and values.

a. ETHICAL.

An ethical behaviour is not applied just by complying with the imperatively applicable regulations but transcends such borders reaching the highest levels of quality and personal integrity, reflecting on the adoption of appropriate decisions and the prevention of noncompliance events, both legal and internal of this Corporation and reducing the risk of penalties, fines or other responsibilities that may hold **CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA** accountable.

In order to present a solid reputation and a trusting and professional behaviour, in **CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA** we must always act in accordance with the following principles and values:

- **Integrity:** Encourage an ethical, honest and good faith performance.
- **Respect for law, human rights and ethical values.**
- **Respect and coexistence:** A working environment is promoted with the aim of a coexistence far from any type of harassment, intimidation, abuse or lack of respect, being intolerable any type of physical or verbal aggression.
- **Transparency and impartiality:** In making any type of decision.
- **Professional development and non-discrimination:** In the promotion within the Corporation and in other aspects, discrimination based on sex, race, religion, marital status, sexual orientation or any other differentiating fact is not admissible.
- **Teamwork and collaboration:** Assuming the interrelation between employees from the different sectors to which the Corporation is dedicated.
- **Quality:** As the essence of dealing with customers.
- **Ethical leadership:** The Presidency and the Directors must set an example and be a reference model both in their behaviour and in the level of compliance with this Code.
- **Corporate image and reputation:** As one of the most valuable assets to preserve the trust of the client, employees, suppliers, authorities and society in general.
- **Legal integrity:** Only the foundational purposes will be developed, and services will be provided for the development of lawful activities. In no case will advice be provided on means or systems to hide or monitor activities of questionable legality.
- **Analytical proactivity:** Proactive client assessment is carried out in order to determine their level of need for the services provided by the Corporation and a report is issued.
- **Continuous training:** The Corporation promotes training and technological research as well as regulatory compliance. All the necessary tools and means are available to ensure such training.
- **Satisfaction of the beneficiaries of the foundation, companies, public administrations, clients and other groups of interest:** All clients are provided with a close, professional and personalised treatment, which takes into account all the values included in this Code of Ethics.

b. CONDUCT.

As the first and fundamental premise, **CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA** will not tolerate action or word that may be hostile, inappropriate or offensive, in order to avoid any annoying behaviour or

that without reason disrupts the respect and coexistence across the workplace. This behaviour, contrary to the principles and values of the Corporation, is incompatible with this Code of Ethics, as well as unacceptable.

The principles of conduct that should govern the daily performance of all of us who are part of **CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA** are:

- **Project assessment:** All projects are analysed, with the same dedication and interest, regardless of their origin, scope, economic content or importance. The assessment is carried out with the appropriate level of detail and, where appropriate, they are assessed according to objective criteria and by accredited independent third parties of recognised prestige.
- **Confidentiality:** At CTA we guarantee confidentiality in the performance of our professional relationships.
- **Internal competition:** The search for excellence within the foundation is promoted by healthy competition based on the collaboration of all its members, adding value and making the Corporation stand out in the Innovation Sector.

4. Structure of the Technological Corporation of Andalusia.

The Corporation is structured in the following organisational chart:

- General Direction.
- General Management or Area Directors.
- Managers.
- Technicians.
- Administrative Staff.
- Compliance Office.
- Responsible for the Management System.
- Responsible for the Internal Information System.
- Security Manager.

5. Internal and external relations.

a. TRUSTEES.

The Board of Trustees of **CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA**, as convinced leaders of the Corporation, take on the commitment to develop and promote this Code of Ethics. To do this, it complies with the guidelines contained therein, serving as an example for the rest of the members of the Corporation.

They are guarantors and interpreters of the internal Regulations to ensure its correct understanding and avoid distorting its principles and ethical values.

b. EMPLOYEES.

For the purposes of this Code, all those linked to the Corporation, regardless of the commercial or working nature of said relationship, are considered employees, in a broad sense.

All employees of **CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA** have the duty to know and comply with this Code of Ethics, which aims to establish their own identity in the performance of the Corporation as a whole.

The employees are the greatest asset that makes up the Corporation, therefore, adapting to common principles and values that allow professional development is sought.

The principles and values indicated herein must be respected, in any case and at any time, as well as an adequate loyal and decorous behaviour with all those belonging to or related with the Corporation.

The employees of **CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA** must meet their obligations imposed by current legislation in terms of health and safety at work. In the same way, the Corporation will ensure compliance in any aspect of employment law issues.

c. BENEFICIARIES AND CUSTOMERS.

The beneficiaries according to the foundation purposes and, on the other hand, clients to whom a service is provided within the legally applicable limits, are the essence of the activity that concerns us, and the respect and maintenance of their trust is essential for the Corporation. Therefore, **CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA** in a personal and professional context with its beneficiaries and clients, acts at all times with coherence, integrity, responsibility and transparency.

d. PROVIDERS and SUPPLIERS.

In **CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA**, ethics and respect preside over the relationship with providers and suppliers, which will be selected according to objective and transparent criteria. The confidential information that emerges from the commercial relationship is protected by the Corporation through the adoption of the appropriate security measures, covering the commitment of confidentiality of all the members of **CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA**, as a sign of extreme diligence.

In the processes of orders or purchases with providers and suppliers, **CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA** will ensure the correct record keeping of all documentation needed for a possible inspection, accounting and internal control.

e. PUBLIC ADMINISTRATION AND AUTHORITIES.

CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA expressly and categorically prohibits any action or omission that promotes or facilitates corruption or bribery of national or foreign authorities, institutions and public officials. The Corporation guarantees that any behaviour contrary to this, will be prosecuted and brought to the attention of the competent authority.

No kind of gift, favour or compensation whose recipients are or come from public officials, national or foreign, institutions or authorities shall be offered or accepted. Except for gifts of little value and that, in any case, are within the uses or locally accepted customs, without prejudice to the total prohibition that affects gifts in cash.

6. Compliance.

The individuals bound by the Code commit to complying with both the values and principles contained therein and the laws in force and the internal regulations of the Corporation. Likewise, they commit to reporting any breach that they detect, and must use the Complaints Channel available to them.

All members of **CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA**, regardless of their position, must avoid any conduct that may damage the reputation of the entity or negatively affect its interests.

a. MONEY LAUNDERING.

CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA will comply with the national and international regulations issued to prevent money laundering.

In this sense, business relationships will not be established with people or entities that do not comply with the aforementioned regulations or that, proceeding, do not provide adequate information in relation to its compliance.

For the fulfilment of such obligations, the members of the Corporation must consult the internal procedure Protocol in the relevant sections referring to this matter.

b. DATA PROTECTION AND CONFIDENTIALITY.

At CTA we guarantee privacy in the processing of personal data.

To this end, **CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA** has assessed the possible risks it faces and prepared the necessary action plans to mitigate or reduce them.

Any incident related to data confidentiality will be communicated to Info@corporaciontecnologica.com,

CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA guarantees, in the development of its activity, the confidentiality of the information to which it has access, which may not be used for personal benefit nor divulged to third parties.

This information includes, but is not limited to, plans, designs, specifications, communications, records, data, graphs, notes, models, samples, technical and commercial information of all kinds whether transmitted verbally, in writing or by means of electronic devices or any other telematic means, professional secrets, contracts, agreements, lists of employees, employers, providers and suppliers, software or computer programmes, information about HR, personnel plans, internal communications, subscription lists and personal data of which you may have knowledge.

All of the above must be respected even after the relationship with the Corporation has ended.

c. INTELLECTUAL AND INDUSTRIAL PROPERTY.

The intellectual and industrial property created by the employees is owned by the Corporation.

All the people involved must protect patents, trademarks, copyrights, trade and business secrets and other information subject to an intellectual and industrial property right of the Corporation.

Likewise, it is essential that we respect the legitimate intellectual and industrial property rights of third parties.

d. TAX AND FISCAL.

CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA will comply with the applicable national regulations of a tax and fiscal nature.

e. ACCOUNTING AND FINANCIAL.

The economic-financial information of the Corporation truly reflects its reality, in accordance with generally accepted accounting principles, legal obligations in the matter and the General Accounting Plan in force at all times.

All members of the Corporation undertake not to distort or conceal the information in the Corporation's accounting records and reports, which shall be complete, accurate and truthful.

f. FREE COMPETITION.

The people involved must respect the principles and rules of fair competition, avoiding the violation of the corresponding antitrust laws.

It is up to the Directors of **CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA** to prevent all agreements, which the Corporation or its employees sign with third parties, from having a negative effect on competition, such as, by way of example, attracting customers unfairly or unfair competition from employees through an express agreement to the contrary.

g. OCCUPATIONAL RISKS PREVENTION AND HEALTH AND SAFETY AT WORK.

CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA ensures a safe working environment, complying with current health and safety at work regulations. Every employee undertakes to perform any training activity that is scheduled to improve their knowledge allowing them to carry out their responsibilities safely and to make responsible use of the materials and equipment provided by the Corporation.

Each employee must comply with the relevant safety measures in order to avoid occupational risks and, in case of doubt about carrying out their job in complete safety, they must immediately notify their Director according to the organigram.

Every employee should disclose any occupational safety concerns that affect them. It is also forbidden to conceal accidents at work or to act in contravention of the safety regulations implemented.

h. ENVIRONMENTAL COMMITMENT.

CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA is committed to ensuring respect for the environment, to minimize the environmental impact of its activity in all its headquarters and to disseminate among its members the culture of respect for the environment as a principle of conduct in its actions. All this in order to guarantee strict compliance with environmental regulations.

Likewise, it undertakes to try to transmit these principles to all the entities with which it maintains a relationship.

7. Internal regulations.

This Code of Ethics is set to be the highest internal standard, which brings together the essential guidelines from which all those Protocols or procedures that allow compliance with current legislation or facilitate and dynamize the internal daily activities of **CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA**.

In order to ensure a correct understanding and an make an informed decision, CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA applies a complete Integrated Management System where all the necessary documentation of the different internal processes is gathered.

8. Conflict of interest.

CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA considers that the relationship with all its members must be based on loyalty that arises from common interests. In CTA the participation in other financial or business activities is respected as long as they are legal and do not collide with their responsibilities towards the Corporation, being, in any case, brought to the attention of the Presidency and the General Management.

The members of **CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA** must avoid any situation in which their personal interests may collide with those of the Corporation. In the event that any one of them find themselves in such a situation, they should immediately inform the Presidency and the General Directors of the Corporation.

In relation to the above, the employees of **CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA**:

- Must not take advantage of personal gains for themselves or for people outside the Corporation with whom they maintain some type of link.
- They may not develop, directly or indirectly, professional activities similar to those they may provide for the Corporation and that may interfere with its interests, without the express authorisation of the management of the Foundation that, in each case, are competent.
- They cannot participate, directly or indirectly, either personally or through interposed persons, in governing bodies of other entities that may collide with the interests of **CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA**.

Without prejudice to the foregoing, in the event that there is any doubt about the existence or not of a conflict of interest, it is recommended to inform the Presidency and General Director of **CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA** in order to carry out the corresponding analysis and avoid, where appropriate, situations that may be harmful to the entity.

9. Offer or acceptance of gifts, commissions or compensation from third parties.

No employee of the Foundation may offer, grant, solicit or accept, directly or indirectly, gifts or favors, favors or compensation, in cash or in kind, whatever their nature, that may influence the decision-making process related to the performance of the functions derived from their position.

Any gift or favor received in contravention of this Code must be immediately returned and this circumstance communicated to the Compliance Body. If it is not reasonably possible to return the gift or favor, it will be delivered to the Financial Economic Management, which, after issuing the corresponding receipt, will allocate it to social interest purposes.

In particular, no employee of the Foundation may offer, grant, solicit or accept gifts or favors from a natural or legal person with whom the Foundation maintains relationships of any kind that, isolated or added together in the period of one year, have a value greater than 100 euros or its equivalent in local currency. Cash gifts are expressly prohibited.

At **CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA** we are extremely diligent in this matter.

10. Use of facilities, means and tools of the Corporation.

CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA, aware of the activity it carries out and the handling of highly sensitive information of its customers, establishes technical security measures in its facilities, covering both the offices and the computer terminals of all its employees and consisting, among others, in access control to facilities, video surveillance, passwords for access to computer programmes, databases, etc.

CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA, makes available to its members and employees the necessary tools for the performance of its activity to the highest quality standards. These means and tools are the property of the Corporation and are subject to their strict professional use, prohibiting any use for personal or any other purpose.

For the correct use of these means and tools, the Corporation has a protocol on their correct use.

11. Registry and conservation of operations, information and documents.

CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA keeps an updated record, and with the appropriate security measures, of all that documentation that is generated as a result of its daily activity and that provided by its customers, suppliers, institutions, Public Administrations or third parties.

The Corporation does not allow the falsification or alteration of any of the documents in its possession. Any operation or work carried out in the name and on behalf of the Corporation has its true documentary reflection to that effect.

To ensure correct documentation management, **CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA** has a Protocol of action for this purpose, which contains the necessary guidelines for the conservation, elimination and archiving of all existing documentation.

12. Knowledge, acceptance and compliance.

CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA assumes the obligation and commitment to publicise all its Internal Regulations and demand their correct and effective compliance. This Code is binding on all members of the Corporation.

The management of **CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA**, as guarantors of the provisions contained in this Code, will make available all the necessary means to disseminate the values and principles of the Corporation and enforce the guidelines of conduct contained therein. They will be a reference model in their behaviour and level of compliance.

It is worth highlighting the figure of the Compliance office within the foundation, whose function is to prevent and coordinate criminal risks, communicate compliance objectives and promote a culture of compliance of the Foundation. As well as the figure of Head of the Internal Information System, who is in charge of managing the complaints channel and guaranteeing compliance with Law 2/2023 of February 20.

The Code, and the rest of the Protocol that make up the Internal Regulations of the Corporation, must be expressly accepted by each of those who are in the subjective scope of application, who must commit to its compliance, so that the principles and values that make it up govern their professional behaviours.

For this purpose, CTA has a record of the conformities received from those affected, stating in it, a copy of this Code signed on by each recipient, as well as an acknowledgment of receipt and returned signed, in case of being made available electronically.

No member of **CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA**, regardless of their level or position, is authorised to request anyone to contravene the provisions of this Code of Ethics, and no one may justify their conduct under an order from a superior or ignorance of this Code.

For the new members of the Corporation, the contents of the Code of Ethics and other internal regulations will be integrated as an Annex to their appointment or hiring, for their knowledge.

The Code of Ethics is part of the management tool of **CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA**, so its content is effectively integrated into the obligations that all employees must comply with as a result of their work or activity to be carried out and may be subject to sanctions in the areas that legally proceed.

13. Control, disciplinary code and complaints channel.

To ensure compliance with this Code and the Protocols that shape it, **CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA** has appointed a Compliance Body of internal Regulations, which will be responsible for ensuring compliance and dissemination of this Code among all its members and receiving communications regarding complaints of non-compliance or consultations on its interpretation. It may act on its own accord or at the request of any recipient of the Code and its decisions will be binding on the Corporation and the subjects that apply to it.

Failure to comply with the internal regulations of **CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA** may lead to internal sanctions in accordance with the internal Disciplinary Regime approved by the Corporation, regardless of the administrative, labour or criminal consequences that may imply.

Any member of **CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA**, as well as suppliers and third parties with links to the Corporation, must denounce, in good faith and without fear of reprisals, any irregularity, breach or unethical conduct carried out by another member of the Corporation.

Complaints or queries, where appropriate, may be sent through the link available for this purpose on the website of the entity (www.corporaciontecnologica.es).

In any case, in order to protect the complainant from the possible consequences derived from the complaint, the confidentiality is guaranteed. Under no circumstances, complaints made anonymously are allowed, except in those cases in which the applicable regulations expressly allow it.

Complaints in bad faith, knowing their falsity or with the purpose of harming a member of **CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA** will be subject to disciplinary sanction, without prejudice to the possible criminal responsibility for the possible commission of a crime of libel or slander, or civil liability for the harm caused by defamation.

14. Update, publicity and availability of the Code.

The management of **CORPORACIÓN TECNOLÓGICA DE ANDALUCÍA** approve this Code, which will come into force on the day of its publication, at which time it will be made known to all the members of the Corporation through the different communication channels usually used, remaining in force as long as its cancellation is not agreed. It will be updated, by the relevant department of the Corporation, whenever the need for modification is detected.