

CODE OF ETHICS



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1. INTRODUCTION

This Code of Ethics (hereinafter, interchangeably, the "**Code of Ethics**" or the "**Code**") is the direct result of the commitment assumed by the entity **DHV Tecnología Espacial Avanzada Malagueña S.L.** and its business group (hereinafter, interchangeably, the "**Company**" or "**DHV**"), to implement a Corporate Social Responsibility programme that constitutes the most appropriate framework to direct the business developed by the Company, from an integral point of view, in a lawful, fair, honest, responsible and transparent manner, managing the impact that its activity may generate on its customers, workers, shareholders, the environment and on the market and society in general.

In this context, this Code of Ethics aims to encompass a set of practices, strategies and business management systems that seek a balance between the economic, legal, social and environmental dimensions that shall govern the activity carried out by the Company. The purpose of this Code of Ethics is thus to serve as a guide for the actions of the Company's directors, professionals, employees, customers and suppliers in order to facilitate decision-making at all levels of DHV, in a global, complex and changing environment and reducing the risk derived from individual influences on ethical conduct standards.

2. JUSTIFICATION

The purpose of this Code of Ethics is to determine the values, principles and ethical and behavioural guidelines that make up DHV's organisational culture

. In this sense, the **essential aims** of the Code of Ethics are:

- (i) To ensure respect, while synthesising and achieving the effective application of the values, principles, basic action and behaviour policy guidelines by the various agents and stakeholders within the scope of DHV's activity and
- (ii) To guide the bases on which the daily work of its representatives, executives, managers and other employees must be undertaken, whatever their responsibility, their position in the DHV organisation, the contractual modality that determines their relationship with the Company or the place where they carry out their activities.

Based on the foregoing, the Code of Ethics includes the **principles and values** applied by DHV on matters of ethics and integrity for the prevention, detection and eradication of irregular behaviours, whatever their nature, without modifying or replacing any existing regulation or policy within the organisation.

This Code also includes certain general principles and recommendations regarding good governance and basic ethical standards that must govern the Company's actions and its relations with employees, customers, suppliers and the market in general at all times.



Ultimately, DHV's assumption of the content of this Code of Ethics represents the Company's express commitment to accept certain conduct criteria to whose strict compliance it is bound.

3. PRINCIPLES AND VALUES

3.1. PRINCIPLES. DUE DILIGENCE

In order to comply with the Code of Ethics, implementing a management and decision-making model that actively contributes to the Company's social, economic and environmental improvement, DHV has established standards and guidelines for action that lead to the development of its activity based on principles whose cornerstone is **Due Diligence**.

For DHV, Due Diligence on matters of ethics and integrity is part of the actions, activities, procedures and policies developed by the Company to achieve adequate knowledge of all the agents with whom it interacts. The principle of Due Diligence refers to the activities that the Company undertakes to prevent, detect and, if applicable, eradicate irregular conduct that is contrary to internal regulations and applicable legislation and that may appear within its organisation.

The Company understands that exercising Due Diligence on matters of ethics and integrity comprises various elements, particularly emphasising the following:

Place special emphasis on risk areas

This Code of Ethics offers general and specific guidelines for conduct on matters of ethics and integrity whose relevance, given the characteristics of the organisation and the businesses in which it operates, is greater.

Assign responsibilities

The Company's Board of Directors is responsible for supervising effective compliance with the Code.

In the opinion of the Board of Directors, the management responsibilities related to its knowledge, understanding and compliance may derive from a **Response Committee** created ad hoc, whose duties and responsibilities must be established in the Company's Compliance Plan (*Compliance*).

In this sense, each of the roles entrusted to the Board of Directors in this Code of Ethics may, if applicable, be delegated to a Response Committee or equivalent body created by the Company's Board of Directors.

Establish commitments

The Code of Ethics summarises the commitments assumed by DHV, as well as all its representatives, executives, managers and other employees on matters of ethics and integrity.

Ensure that people know and understand the commitments



DHV will allocate the necessary resources to ensure that this Code, as well as the standards on which it is based, are known and understood by all employees, as well as by the main agents of the business and stakeholders within the scope of its commercial activity.

Thus, and as an integral part of it, this Code defines the *Action Conducts for the different Stakeholders*.

Supervise and monitor

Responsible of ensuring knowledge of, understanding and compliance with the Code of Ethics and of ensuring the correct functioning of the safeguard mechanisms established for this purpose, will in any case be the Board of Directors, which, pursuant to the foregoing, will have the power to delegate this responsibility to a Response Committee created for this purpose.

In this case, the Response Committee must periodically report on all the functions it assumes to the DHV Board of Directors.

Safeguard compliance

The Board of Directors undertakes to create a notification and consultation procedure that enables the organisation's employees, in good faith and safe from reprisal, to report any existence of irregular practices on the matters contemplated

within this Code. All employees of the organisation are obliged to report any irregular behaviour that they may observe.

Pursuant to the foregoing, the Board of Directors, if deemed appropriate, may refer to the Response Committee the functions related to processing notifications and inquiries received and ensure, in general, compliance with the Code in the organisation.

Correct poor practices

DHV applies the principle of zero tolerance for poor practices on the matters included within this Code. Breaches will be analysed and resolved pursuant to internal regulations and applicable legislation and pursuant to the procedure established for resolving notifications and inquiries in criminal and other matters.

Improve

DHV undertakes to develop, if necessary, the internal regulations, procedures and control elements that are necessary for the effective implementation of the commitments contained in its Code of Ethics.

3.2. VALUES

On the basis of Due Diligence, the Company and all people that comprise it must guide their actions around the following values that must support the activity carried out by the Company:



1. *Satisfying needs and excellence in customer service.*
2. *Respect for employees and other agents linked to the organisation.*
3. *Transparency, constancy, responsibility and honesty.*
4. *Ethical commitment and corporate social responsibility.*
5. *Business efficiency and continuous improvement of the business management model and its internal processes.*
6. *The commitment to training, learning, research and innovation of its products and services.*
7. *The capacity for analysis, adaptation and self-criticism.*
8. *Respect for the environment.*
9. *The pride of belonging of the directors, representatives, executives, managers and employees to DHV and its business projects.*

4. SCOPE OF APPLICATION

Pursuant to the preceding sections, the Code of Ethics is aimed at all DHV directors, representatives, executives, managers and other employees, regardless of the position they occupy, the nature and type of agreement that determines

their relationship with the Company or the place where they carry out their duties.

DHV will also promote and encourage the adoption of behavioural guidelines aligned with those defined within this Code of Ethics among its suppliers, collaborating companies, commercial allies and other participating agents within the scope of its commercial activity.

The conduct criteria included within this Code are not intended to describe all the situations or circumstances that directors, representatives, executives, managers and other employees may encounter, but rather to establish general guidelines for conduct that guide them in the performance of their responsibilities.

The obligatory nature of assuming the principles, norms and duties that are described within this Code is without prejudice to the fulfilment of any other norms or obligations contained within applicable current legislation and regulation, in the Corporate Articles of Association and/or in the regulations and other internal rules that govern DHV's operation.

5. ACTIONS FOR THE DIFFERENT STAKEHOLDERS

The principles of conduct that prevail in the Company's organisation are defined below, analysed taking the Stakeholders with which it is related into account. It must therefore be considered that although the Stakeholders are identified for a better understanding of this Code of Ethics, any principle



described here shall generally apply to any person who has any type of connection or relationship with the Company.

5.1. EMPLOYEES

Compliance with current legislation

Activities must be carried out with strict respect for human rights and public liberties, pursuant to internationally accepted laws and practices. Among the standards that DHV takes as a reference are the International Bill of Human Rights and the fundamental ILO conventions on labour practices.

DHV will ensure compliance with the labour provisions contained in the fundamental conventions of the International Labour Organisation and does not admit, under any circumstances, practices contrary to these principles, which refer to freedom of association, collective bargaining and the elimination of child and forced labour. Nor will it admit practices contrary to these fundamental principles among its suppliers, contractors or, in general, collaborating companies.

Work environment

DHV is committed to creating a work environment where all employees are treated with respect and dignity. Equal opportunities are one of the main focal points of this Code of Ethics.

Any situation of harassment or abuse or any other type of conduct that makes work detrimental or offensive will not be accepted.

DHV will ensure and promote a safe environment.

Collaboration and teamwork

At DHV, the collective prevails over the individual. Collaboration and teamwork are essential requirements for DHV to achieve its objectives and to take full advantage of the skills, resources and diversity of knowledge, abilities and experience that make up the organisation.

The organisation promotes, facilitates and encourages collaboration and teamwork, regardless of the functional area in which the activity is carried out.

All employees must show a spirit of collaboration, making their knowledge, skills and talent available to whoever needs it to contribute in this way towards achieving the organisation's overall objectives and interests.

Health and safety of people

In terms of health and safety, DHV's commitment is based on scrupulous compliance with the applicable regulations in all the areas in which operates, in order to offer employees a healthy and safe work environment. The organisation will also continuously improve the measures for workplace hazard prevention and promoting health



at work in each of the places where its activity is carried out.

All people linked to DHV are responsible for strictly complying with the health and safety regulations related to their work. They must also make responsible use of the materials and tools assigned to them for carrying out their activities.

DHV undertakes to provide employees with all the information and resources necessary for them to comply with the Health and Safety regulations defined by the Company at all times.

People associated with DHV must refrain from using alcohol or drugs in the workplace. Alcohol can only be served at business meals pursuant to local practices.

DHV promotes and encourages the adoption of advanced health and safety practices among its suppliers, contractors and, in general, collaborating companies.

Knowledge of the information

All employees must observe, in all circumstances, irreproachable ethical behaviour and avoid activities of a nature that could harm DHV's material interests or corporate prestige. Nor must they collaborate with third parties in activities that could break the law or damage third parties' trust in the organisation.

All DHV employees must know and understand the laws and regulations relevant to their business activity and request, in case of doubt, the advice they require from areas of the organisation specialised in the different matters.

DHV thus undertakes to make the necessary training available to its personnel so that they know, understand and comply with the commitments established by the Company.

Information confidentiality

In general, and unless otherwise indicated, the information (understood in a broad sense) to which people linked to DHV have access in the performance of their professional obligations, must be considered confidential and must be used exclusively for carrying out the roles that each one has assigned.

Employees and persons linked to the Company undertake to maintain confidentiality and to make discreet use, pursuant to the internal regulations on the matter, of the information to which they have access in the performance of their duties and professional obligations. Therefore, they must only share information classified as confidential with other people in the Company who require it for the performance of their work. They must not reveal any type of information to other people until it has been made public. Nor must they duplicate, reproduce, or make more use of the information than is strictly necessary for carrying out their tasks. Likewise,



in no case must they use or access information that is not authorised by the Company, nor disclose it to third parties.

The obligation to maintain the confidentiality of the information provided by the Company will persist even when the professional relationship has ended and will include the obligation to return any material related to DHV that the employee or the person related to it has in their possession at the time of terminating the relationship with the Company.

Control of financial and accounting information

Fraud is any intentional and deliberate action carried out by an employee or a third party to achieve a direct or indirect benefit for him or herself or for the organisation, making use for that purpose, and in an inappropriate way, of the organisation's information, assets or resources.

In this sense, the falsification, manipulation or deliberate use of false information constitutes fraud.

As a behaviour principle, DHV assumes the transparency and reliability of financial and accounting information, as well as compliance with applicable regulations.

Employees must transmit such information in a truthful, complete and understandable manner. In no case must they knowingly provide incorrect, inaccurate or imprecise information that could mislead the recipient.

Similarly, employees must clearly and accurately reflect the transactions, facts and events in the company's records and must take special care with respect to the reliability of the financial and accounting information entered in the Company's systems, which will reflect the corresponding date, the rights and obligations through the corresponding assets and liabilities, pursuant to the applicable regulations. The records must reflect the totality of the transactions, facts and events of the organisation.

DHV directors and all the people in the Company's organisation undertake to guarantee periodic supervision of the effectiveness of the internal control system on the preparation of financial and accounting information.

If the organisation's employees observe circumstances that, according to their best knowledge and belief, represent a breach of the above principles of conduct regarding internal control of financial information, they must inform the Board of Directors.

In any case, only authorised spokespersons for the Company may make public comments about DHV's activities or results.

Use and protection of assets

DHV employees have the resources they need to carry out their professional duties. The assets that the Company



makes available to employees include, but are not limited to, physical assets and information.

Both misappropriation and inappropriate use of DHV assets constitute fraud.

DHV personnel must protect and make good use of the resources and assets made available to them and use them in a responsible manner to avoid their damage, loss, theft or inappropriate use. The resources must be used, unless the organisation determines otherwise, exclusively for the performance of the roles assigned to the people of the organisation.

DHV personnel must also strictly comply with the provisions of internal and external regulations regarding **industrial property and intellectual property** protection. This includes, without limitation, patent rights, trademarks and service marks, utility models, domain names, reproduction rights (including software reproduction rights), design rights, database extraction rights, rights to specialised technical knowledge and business, commercial and industrial secrets, including know-how.

Regarding the access and use of **information technologies**, DHV employees must conduct themselves in an ethical, legal and professional manner. In no case may they use these media to access or distribute material that intimidates, harasses, threatens, has sexually explicit content or is otherwise offensive or inappropriate,

nor may they send any false, derogatory or malicious communication or that which may be offensive to the recipient. Nor must they use funds or credit cards provided by the organisation to defray unauthorised personal expenses or those not related to the activities of the company in which they provide their services, inappropriate practices or socially unacceptable conduct related to the above matters or to any other.

All documents, data and correspondence contained in the information systems that DHV makes available to its employees are subject to review. By accepting this Code of Ethics, the Company's employees acknowledge its right at all times to monitor, supervise, inspect and control electronic communications and computer equipment that the company makes available to them.

DHV personnel must also comply with current legislation on **data protection**, including personal data.

DHV undertakes to offer employees the information, knowledge and resources necessary to comply with the provisions of internal regulations and applicable legislation regarding information management and data protection, which must also be observed with the utmost rigour by employees.

Finally, DHV's good name is the Company's main hallmark. The conduct of the people in the organisation must be aimed at preserving and protecting this asset.



Gratuity, Corruption and Bribery

Any provision, free of charge, of the Company's goods or services must be expressly and previously authorised.

In the exercise of the roles of their positions, DHV employees may not request or receive, on their own behalf or through an intermediary, any gift or present that has the purpose of influencing their decisions, having to communicate any proposal to their superiors in order to receive it.

In this sense, any person related to DHV must reject corruption in all its forms and must act in line with Spanish and international provisions on the matter, including the Spanish Penal Code and the OECD guidelines for multinational companies.

Under no circumstances may DHV employees, directors or managers use unethical practices to influence the will of third parties with the aim of obtaining any benefit for DHV or for themselves. In the same way, they must remain alert to prevent third parties from making use of these practices in their relationship with the company.

DHV expressly prohibits undue payments, gifts or benefits to any public or private person or entity with the intention of obtaining or maintaining business or other benefits or advantages. DHV employees may not directly or indirectly make, offer or receive, in any case, benefits, gifts or gifts in

cash. They may not directly or indirectly make, offer or receive benefits, details or gifts that, due to their value, characteristics or circumstances, could reasonably alter the development of the commercial, administrative or professional relationships in which they participate.

In this sense, DHV employees must apply their professional judgement and common sense to determine the border between what is acceptable and what is unacceptable, based on the socially appropriate uses in the different areas in which DHV operates. In case of doubt, they must always consult their hierarchical superior.

Gifts and benefits must therefore be received or delivered exclusively for legitimate interests, complying with internal regulations and applicable legislation, and be enjoyed jointly by the recipient and whoever delivers them. In the same way, the gifts and benefits received or delivered must be sporadic, to avoid that regularity could lead an independent third party to doubt your good faith. Additionally, gifts and hospitality must be socially acceptable, in such a way that, if they are publicly known, they will not cause discomfort to the recipient or to whom they are delivered. To determine the extent to which a gift or benefit is acceptable in terms of value, the reciprocity criterion must be applied. Whether they are the recipients or the givers, a gift must be acceptable to the extent that it could be reciprocated by the recipient.



Personnel must ensure not only that gifts and benefits to third parties are proportionate, reasonable, transparent and legitimate, but that they are also duly recorded by the Company.

They must also refrain from making payments to facilitate or expedite procedures, consisting of sending money or other things of value, whatever their amount, in exchange for ensuring or expediting the course of a procedure or action in front of any judicial body, public administration or official body. Expenses related to administrative procedures are not considered facilitation payments.

In particular, no employee may, without authorisation, offer, grant, request or accept gifts or benefits to/or from a natural person or company with whom DHV maintains relationships of any kind which, individually or added together in the period of a year, have a value greater than 300 euro. In any case, gifts and benefits in cash are strictly prohibited.

Management style of the officers and directors of the Company

The attribution of managerial powers at all levels of DHV will also entail the assumption of responsibilities derived from decision-making.

The exercise of command will also be a training school, an exercise in constant evaluation, talent stimulation and a channel for employees' professional

development through the design of career plans and succession plans for management positions.

DHV directors and senior managers are responsible for motivation and communication between the members of their teams, promoting a participatory management style in which communication is enhanced, delegation is practised and initiative, team work, results orientation and collaboration with others is fostered.

Conflict of interest and business opportunities

Employees are obliged to communicate to immediate hierarchical personnel any conflict of interest that may arise between themselves (or persons related to them) with customers or suppliers.

Similarly, employees (and people related to them) may not take advantage of or benefit from information or business opportunities that they have become aware of as a result of their employment relationship with the Company.

Representatives, directors, managers and other DHV employees must avoid situations that could lead to conflict between their personal interests and those of the organisation. They must also refrain from representing it, intervening or influencing decision-making in which, directly or indirectly, they or a third party close to them have a personal interest.

Loyalty and non-competition principle: Other activities



The relationship between DHV and its employees must be based on loyalty that stems from common interests. In this sense, the organisation respects its employees' participation in other social, financial or business activities, provided that the internal regulations do not provide otherwise, that such activities are legal and that they do not enter into competition or cause any conflict of interest with their responsibilities within DHV or with the interests of the organisation.

In any case, the Company's employees must communicate in advance, through the channels established for this purpose, their intention to undertake activities in addition to their responsibilities at DHV and may not take advantage of opportunities that they have become aware of in their capacity as of employees of the organisation for their own benefit.

No employee or personnel related to DHV may provide services as a consultant, advisor, manager, employee or advisor to a competitor of the organisation, except for services that may be provided at the request of DHV or with its authorisation.

Irregular transactions

Any person linked to DHV must remain alert to cases in which there may be indications of lack of integrity of the people or entities with whom they are professionally related.

In particular, DHV employees must generally avoid unusual cash payments, those made by bearer cheques or those made in currencies other than the currency

previously agreed upon. They must also avoid payments made to or by third parties not mentioned in the corresponding agreements, as well as those made in accounts that are not the usual ones in relationships with a certain entity, organisation or person and review with special attention those payments not provided for in the corresponding agreements or contracts.

Likewise, in general, payments may not be made to people, companies, entities or accounts opened in countries or places classified as tax havens by applicable Spanish regulations, or to entities in which it is not possible to identify the partner, owner or ultimate beneficiary.

People who work at DHV must make every effort to prevent money laundering. They must also apply the principle of due diligence to avoid collaborating with third parties that could serve as a cover for terrorist or criminal activities.

5.2. CUSTOMERS

Confidentiality

DHV is obliged to guarantee that any information it has about the relationships it maintains with customers is duly protected by the legislation on personal data protection.

Non-equivalence



The Company will make every effort to ensure that the customers with whom it interacts, by accepting this Code, undertake not to take advantage of business opportunities by hiring for themselves or for third parties linked to them, labour or other personnel of another nature of DHV.

DHV will therefore disseminate the contents and principles of this Code of Ethics among its customers, encouraging them to report irregular practices by people linked to DHV that they may observe.

Service quality

Customer satisfaction with the services provided by the Company is the main objective of DHV's business activity.

All employees must be aware that success in the relationship with customers lies in the correct provision of the services offered by the Company.

Customer relationships

All the relationships that the Company maintains with its customers will be duly documented in the form that is legally appropriate and expressed in clear terms that allow the rights and obligations arising from the aforementioned relationships to be determined with precision.

5.3. SUPPLIERS

Selection policy

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

Confidentiality

Knowledge of protected information to which DHV has access, as a result of its relationship with suppliers and subcontractors, will have the guarantees provided in the applicable legislation on Data Protection.

Non-equivalence

The Company will make every effort to ensure that the Suppliers with whom it interacts, by accepting this Code, undertake not to take advantage of business opportunities by hiring for themselves or for third parties linked to them, labour or other personnel of another nature of DHV.

Supplier relationships

DHV people who participate in the selection processes of suppliers, contractors or external collaborators are obliged



to act impartially and objectively, adopting the selection criteria adopted by the Company. They must also take reasonable steps and act with due diligence to avoid acquiring material of questionable origin and exercise due control to avoid the illegal employment of workers throughout the DHV supply chain.

The people employed at DHV must monitor respect for the Company's image and reputation by contractors and suppliers and, in general, collaborating companies, and must avoid undue influence in the selection and contracting processes.

DHV will disseminate the contents and principles of this Code of Ethics among suppliers and contractors, encouraging them to report irregular practices by people linked to DHV that they may observe.

5.4. PARTNERS AND DIRECTORS

Transparency and value creation

The rights of the partners and directors before the Company will be governed at all times by the principle of strict compliance with all current regulations and, especially, by those of a corporate nature.

The fundamental mission of the Company's directors, always respecting the essential principles that govern commercial legislation, is aimed at creating value for the benefit of the Company and its partners.

5.5. THE MARKET

Respect for free competition and behaviour in the market

DHV will comply with the rules established in the market regarding free competition and will avoid joint action or collusion with competitors.

The Company will compete in the market fairly, committing itself to conduct its business in a transparent, honourable manner and not to take part in activities that involve unfair competition, including misleading, incorrect or malicious information about competitors. It will also avoid all forms of fraudulent conduct that entails obtaining undue advantages over customers, suppliers or competitors. In particular, DHV will take the greatest care in ensuring that the conditions established in the agreements are met and that the procedures are implemented correctly to avoid inappropriate treatment of customers or non-compliance with the established conditions.

In the development of their commercial activities, the people linked to DHV will promote the organisation's products and services based on objective standards, without in any way discrediting



the competition or falsifying their conditions or the characteristics of their products or services.

Given DHV's activity and corporate purpose, all persons linked to it must also strictly observe local, regional, state, community and international laws and regulations, with special attention to foreign trade regulations.

They must also ensure that the aid requested or received from public administrations is used appropriately and that its request follows transparency criteria, avoiding distorting the conditions for obtaining it or misusing it.

DHV employees' search for market information or about companies in the sector must always be carried out ethically and pursuant to the regulations that protect this type of information. People linked by any relationship to DHV must reject data on competitors obtained unduly or in breach of the confidentiality under which it is maintained by its legitimate owners. In particular, they must take special care not to infringe company secrets in the cases of hiring professionals from other organisations in the sector in which the Company interacts.

Export and international trade

DHV is aware that it develops its business with people and companies from various countries of Europe and the rest of the world.

In those countries where requirements and restrictions are imposed on international trade, DHV personnel must scrupulously comply with current regulations and must present exact information on their activities to government authorities that request it.

In particular, DHV employees must strictly comply with the provisions of **Spanish legislation on international trade in defence and dual use matters.**

For imports and exports that require it, DHV will wait for the approval of the corresponding government authorities.

All employees of the organisation who carry out activities in this area must be aware that their decisions must be verifiable, in the sense that they must be in a position to show that they have followed the rules and procedures established if the processes are reviewed by a third party.

The Company will become familiar with the companies and people with whom it does business. It will apply reasonable diligence in the selection of new customers and business partners in order to ensure that it complies with the laws that regulate international trade in goods and services.

Political neutrality



The Company will develop its business model without interfering with or participating in the political processes of those countries and communities in which it carries out its activities.

Any relationship of the people linked to DHV with governments, authorities, institutions and political parties must be based on the principles of legality and political neutrality. In no case may donations be made to any political party or in favour of its representatives, except in those cases expressly provided for within the applicable legislation.

DHV recognises its employees' right to exercise their freedom of expression, political thought and, in general, participation in public life, as long as it does not interfere with the performance of their activity in the Company, takes place outside working hours and of any Company facility, and always in such a way that such participation could not lead an external observer to associate it with one or another political option.

Environmental and social commitment

DHV addresses its environmental commitment from strict compliance with the applicable legislation on the matter in all its areas of operation. The Company carries out its activities with the greatest respect for the environment and minimising the negative effects that it may eventually cause.

DHV will therefore establish best practices and promote the training necessary to preserve the environment

among its employees. In its relations with contractors, suppliers or external collaborating companies, it will transmit these principles and demand compliance with the environmental procedures and requirements that are applicable in each case and will provide the means to ensure adequate compliance with them.

In this sense, DHV undertakes to correct environmentally inappropriate behaviours, or those not committed to caring for the environment, that could be detected.

The Company will make continuous effort to identify, classify and minimise the environmental impact of its activities and be committed to efficiency, responsible consumption and protection of the natural environment. All members of the Company share its environmental commitment.

DHV is committed to responsible action in all countries in which it operates. In particular, it assumes responsibility for contributing to the development of the people and communities affected by its activities and therefore developing advanced practices in the field of corporate social responsibility.

If applicable, DHV's commitment may be carried out through sponsorship, patronage and social action activities carried out by the Company or channelled through support to social organisations. All donations made will have the necessary authorisations. DHV will also encourage employees' collaboration with projects and social organisations



in the places where it operates, through, among others, corporate volunteer programmes.

The Company will also only provide support to those organisations that have an impeccable reputation and that can guarantee the proper administration of the assigned resources. All donations must be faithfully reflected as such in the organisation's records.

6. NOTIFICATION OF IRREGULAR CONDUCT

Irregular conduct on the matters contemplated in the Code of Ethics could have serious consequences for DHV.

All persons linked to DHV are obliged to comply with the Code of Ethics and to contribute to its compliance, as well as to consult their doubts and report any irregular conduct that they may observe, if applicable. The obligation to report also extends to those cases in which irregular conduct may be detected by third parties and, in particular, by suppliers, contractors or collaborating companies.

DHV will approve a procedure that enables all employees to inform the organisation, in good faith, confidentially and without fear of reprisal, irregular behaviours on the matters contemplated in the Code of Ethics that refer to criminal matters or those of another nature and on the internal rules of conduct on which it is based.

People linked to DHV may also consult doubts or propose improvements in the internal control systems that the organisation has in the areas contemplated in the Code of Ethics or to point out behaviours or areas in which there is a significant risk of irregular behaviour.

Ultimately, the responsibility of ensuring compliance with the organisation's internal rules of conduct resides with the Company's Board of Directors, which, pursuant to the above, may delegate the management of these matters to the Response Committee.

The functions assigned to the Board of Directors or, if created, to the Response Committee on matters of supervision of the correct compliance with this Code, are:

- Ensure the correct operation of the notification and consultation procedure for communicating irregular conduct in relevant matters from a criminal point of view and those of any other nature.
- Process the notifications received about irregularities on matters contemplated in the Code of Ethics, supervise their resolution according to the procedure defined for this purpose and resolve any doubts raised by the application or interpretation of this Code of Ethics.
- Promote knowledge and understanding of the Code of Ethics among all people linked to the Company.



- If applicable, the Response Committee or equivalent body must report regularly to the DHV Board of Directors about the degree of compliance with the Code of Ethics, proposing the recommendations it deems necessary.

Employees must send their communications on matters related to the Code of Ethics, confidentially, in good faith and without fear of reprisal, to the Board of Directors or, if applicable, to the Response Committee, through the Complaints Channel enabled for this purpose by DHV or, otherwise, by the email address also enabled for this purpose or to the following postal address: Av. Juan López de Peñalver, 21, 29590 Málaga (Spain).

It is the responsibility of the Board of Directors or, if applicable, the Response Committee, to resolve any doubts regarding the application or interpretation of the principles of conduct contained in the Code of Ethics. In its resolution, it will have the collaboration of the functional areas of the Company specialised in the different matters. The resolution of the notified irregularities and any accompanying penalties will be resolved pursuant to the specific procedure established for such purpose.

All notifications received, which must preferably be nominative, will be evaluated and treated confidentially. The data of the intervening parties may be communicated only if the denounced fact leads to the initiation of actions by administrative or judicial authorities and to the extent required by those authorities, as well as pursuant to Spanish Organic Law 3/2018, 5 December, on Personal Data Protection

and guarantee of digital rights and, if applicable, to the people involved in any subsequent investigation or judicial procedure initiated as a result of the investigation.

DHV will not tolerate retaliation committed against those who use the established procedures for reporting misconduct.

All DHV personnel who are responsible for managing matters related to the Code of Ethics must pay the greatest attention to ensuring individuals' right to honour.

7. RESPONSIBILITIES

All persons linked to DHV are responsible for knowing, understanding and complying with the principles of conduct set forth in the Code of Ethics. They are also responsible for:

- Knowing, understanding and complying with the commitments of conduct contained within this Code of Ethics, as well as with the rules and procedures applicable to their job position.
- Contributing, to the extent of their possibilities, to knowledge, understanding and compliance with the Code.
- Ask for help in case of doubt.
- Report irregular behaviours that they may observe.



- Collaborate in the correct functioning of the internal control systems implemented by the organisation to ensure compliance with the Code of Ethics and other internal regulations that govern DHV.

DHV people who are entrusted with administration, executive or team management functions have additional responsibilities regarding the Code of Ethics, including:

- Collaborate, in their area of responsibility, in the knowledge, understanding and compliance with the Code of Ethics and the rules and procedures on which it is based.
- Contribute to generating the desired ethical tone in the Company, helping to make the expected behaviours known.
- Provide support to people who, in good faith, report irregular behaviour on the matters contemplated in the Code of Ethics, maintaining confidentiality and protecting them from any retaliation.
- Observe professional conduct that serves as an example and a reference for all DHV workers. Their behaviour must be an example to follow.

8. INFORMATION AND SUPPORT

The Code of Ethics includes the guidelines for the expected behaviour of all agents that are part of DHV.

In case of doubt, pursuant to the above, DHV employees may obtain help from their hierarchical superior and, ultimately, from the Board of Directors.

If they require specific advice on the issues included within this Code, employees can also turn to functional areas and departments of the organisation that specialise in such matters, such as the Legal Department.

9. APPROVAL, UPDATING, VALIDITY AND DISSEMINATION OF THE CODE

This Code of Ethics has been approved by the DHV Board of Directors, in its session held on 2 November 2021, and entered into force on that date, being applicable until its update, revision or repeal is approved.

The Company's Board of Directors is the only body competent to modify the content of this Code of Ethics.

The Code will be reviewed and updated periodically as indicated by the Board of Directors. Any revisions and updates will comply with the commitments acquired by the Company on matters of ethics and good governance and the new obligations that may arise from regulatory changes and will be communicated to all personnel.

This Code will be disclosed to all DHV directors, representatives, executives, managers and other employees in the manner deemed most appropriate. The Code of Ethics will also be published



on the Company's corporate website: <https://dhvtechnology.com/>, so that customers, suppliers and other agents with whom the Company interacts can access its content.

Notwithstanding the foregoing, the Company will make it available to all its directors, representatives, executives, managers and other employees and, if applicable, to third parties who interact with DHV in their commercial relationships, through the internal and external communication channels as appropriate.