



CODE OF ETHICS

CHANGE HISTORY

VERSION	DATE	AUTHOR	CHANGES
1.0	2022		CREATION OF THE CODE
2.0	2026		REVIEW AND UPDATE
3.0	2026	COMPLIANCE	ADDITION OF COMPETITION/ANTITRUST SECTION AND REINFORCEMENT OF TRAINING: a new section dedicated to competition law compliance (3.7) and an expanded section 3.1 on the compliance system.

TABLE OF CONTENTS

1.	Introduction and Purpose.....	5
1.1.	Management Statement.....	5
1.2.	ubimia®'s Commitment to Ethics and Integrity.....	5
1.3.	Purpose of the Code.....	6
1.4.	Scope and Field of Application.....	6
1.5.	Mandatory Adherence.....	6
2.	Our Fundamental Principles.....	7
2.1.	Regulatory Compliance.....	7
2.2.	Integrity and Transparency.....	7
2.3.	Professional Independence.....	7
2.4.	Excellence and Client Orientation.....	7
2.5.	Respect for People.....	8
2.6.	Environmental and Social Responsibility.....	8
2.7.	Confidentiality and Information Protection.....	9
3.	Governance and Compliance.....	10
3.1.	Compliance System.....	10
3.2.	Prevention of Money Laundering.....	10
3.3.	Prevention of Corruption and Bribery.....	11
3.4.	Conflicts of Interest.....	12
3.5.	Whistleblowing Channel and Protection of the Informant.....	12
3.6.	Disciplinary Measures.....	13
3.7.	Competition Law Compliance.....	13
3.7.1.	Prohibited Conduct.....	13
3.7.2.	Caution at Sector Meetings.....	14

3.7.3.	Advice and Consultation.....	14
3.7.4.	Consequences.....	14
4.	Relationship with Our Stakeholders.....	14
4.1.	Clients.....	14
4.2.	Team Members.....	15
4.3.	Suppliers and Partners.....	16
4.4.	Public Authorities.....	17
4.5.	Society and the Environment.....	17
5.	Protection of Information and Assets.....	18
6.	Supervision, Monitoring, and Update.....	18
7.	Acceptance and Commitment.....	19

CODE OF ETHICS

1. Introduction and Purpose

1.1. Management Statement

At ubimia® we understand that ethics is not an accessory element of our activity, but a structural principle that guides our decisions and our relationships with clients, collaborators, and society.

This Code of Ethics reflects our commitment to integrity, transparency, and regulatory compliance. It establishes the conduct framework that must govern the actions of all persons connected to the organisation and reinforces our responsibility as a company towards our stakeholders.

Management assumes the responsibility of promoting an effective compliance culture, fostering supervision, prevention, and continuous improvement mechanisms, and integrating environmental, social, and governance criteria into our business strategy.

Acting with coherence, rigour, and responsibility is not merely a legal requirement. It is the foundation of the trust we build every day.

The Management of ubimia®

1.2. ubimia®'s Commitment to Ethics and Integrity

At ubimia® we understand ethics as a structural principle of our way of acting. It is neither a reputational complement nor an external requirement: it is the foundation upon which we build our professional relationships, our decision-making, and our business model.

This Code of Ethics establishes the principles and standards of conduct that must govern the actions of all persons forming part of ubimia®, as well as those third parties acting on its behalf or in its representation.

1.3. Purpose of the Code

Its purpose is to:

- Guarantee honest and transparent behaviour.
- Reinforce the trust of clients, partners, and other stakeholders.
- Prevent legal and reputational risks.
- Integrate ESG criteria into our daily operations.
- Consolidate a culture of compliance and accountability.

1.4. Scope and Field of Application

This Code is mandatory for:

- Management.
- Employees.
- Collaborators and contractually linked third parties where so established.

1.5. Mandatory Adherence

Adherence to the Code shall be formalised through its express acceptance and its integration into the organisation's internal processes.

La Política anticorrupción y contra el tráfico de influencias de ubimia® es de **cumplimiento obligatorio** y forma parte integrante del marco disciplinario de este Código. Las conductas reguladas por dicha política serán de aplicación inmediata y podrán motivar medidas disciplinarias según lo previsto en la normativa interna y laboral.

2. Our Fundamental Principles

2.1. Regulatory Compliance

ubimia® acts in full compliance with the legislation in force in all areas in which it operates. Legal compliance constitutes the minimum required standard; our ethical commitment goes beyond mere formal compliance.

All persons connected to the organisation must be aware of and respect the regulations applicable to their area of activity.

2.2. Integrity and Transparency

We act with honesty, objectivity, and consistency. We do not tolerate deceptive, fraudulent, or bad-faith conduct.

Transparency in information, management, and decision-making is a non-negotiable principle.

2.3. Professional Independence

Professional decisions must be adopted using technical and strategic criteria, free from undue influence, external pressures, or personal interests.

2.4. Excellence and Client Orientation

Our activity is founded on:

- Professional rigour.
- Technical quality.
- Clarity in communication.
- Responsible and efficient service.

Client trust is built through consistency, soundness, and fulfilment of commitments.

2.5. Respect for People

We promote a working environment based on:

- Equal opportunities.
- Non-discrimination.
- Mutual respect.
- Zero tolerance towards harassment or any form of intimidation.

Talent and diversity are strategic assets for ubimia®.

Situations relating to discrimination or harassment may be reported through the Whistleblowing Channel or through the established internal mechanisms, guaranteeing confidentiality and the absence of reprisals. ubimia® may activate specific internal protocols where the nature of the complaint so requires, ensuring impartiality and protection of those affected.

2.6. Environmental and Social Responsibility

We integrate sustainability criteria into our business activity, promoting:

- Efficient use of resources.
- Reduction of environmental impact.
- Responsible consumption.
- Collaboration on environmental improvement initiatives where consistent with our activity.

ubimia® embraces sustainability as part of its governance model.

ubimia® respects and promotes internationally recognised human rights, including the principles set out in the Universal Declaration and in the fundamental conventions of the International Labour Organization.

This commitment extends to our relationships with clients, suppliers, and collaborators, promoting responsible practices throughout our value chain and rejecting any form of forced labour, child labour, or violation of fundamental rights.

ubimia® will not tolerate practices contrary to human dignity at any stage of its activity or in its supply chain.

2.7. Confidentiality and Information Protection

Information is a strategic asset. We guarantee:

- Protection of personal data in accordance with the GDPR.
- Safeguarding of confidential information.
- Responsible use of technological systems.
- Protection of intellectual property.

Access to information shall be strictly limited to those who need it to carry out their duties.

Persons connected to ubimia® may use the Whistleblowing Channel to report any incident related to information security, data protection, or misuse of technological assets.

All persons connected to ubimia® are responsible for acting diligently in the protection of information assets and for reporting any security incident of which they become aware.

3. Governance and Compliance

3.1. Compliance System

ubimia® has a regulatory compliance system aimed at:

- Preventing the commission of offences.
- Detecting irregular conduct.
- Establishing internal control mechanisms.
- Fostering a cross-cutting ethical culture.

Management designates a Compliance Officer responsible for supervising the implementation, update, and monitoring of the system.

The Compliance Officer carries out his or her function with autonomy and independence and has, within the legally permissible scope, the following rights for the performance of his or her duties:

- Access to ubimia®'s books, records, contracts, corporate communications, and information systems where necessary for the prevention, detection, or investigation of a possible breach.
- Right to information from any person connected to ubimia®, who must cooperate diligently.
- Direct communication with the General Management and access to the governing bodies where the nature of the matter requires it. Annually, the Compliance Officer shall submit to Management a Compliance Report that shall include at minimum: the status of the model, training delivered, risk analysis, relevant incidents, and an action plan.
- The detailed duties and prerogatives are set out in the Compliance Function Statute.

3.2. Prevention of Money Laundering

ubimia® rechaza cualquier práctica relacionada con el blanqueo de capitales o la financiación ilícita. La organización actuará con diligencia en la identificación de contrapartes y en la evaluación de operaciones que puedan presentar riesgos de origen ilícito de fondos.

Should reasonable indications of irregularity be detected, ubimia® shall adopt appropriate measures and may refrain from formalising or continuing the contractual relationship.

3.3. Prevention of Corruption and Bribery

The following are prohibited:

- Offering or accepting bribes.
- Making improper payments.
- Promising unjustified advantages.
- Participating in influence peddling.

Gifts or benefits that could compromise professional objectivity shall not be accepted. Token gifts of limited value must comply with usual and transparent practices. The thresholds and procedures established in the Anti-Corruption Policy apply (mandatory registration for gifts and invitations exceeding EUR 60 or any amount that could create an appearance of undue influence).

Facilitation payments and any practice involving the remittance of amounts to third parties to expedite or condition administrative actions are expressly prohibited. For detailed rules on gifts, invitations, and relationships with public officials, please consult ubimia®'s Anti-Corruption Policy.

ubimia® prohibits any form of fraud, accounting manipulation, document falsification, or intentional alteration of financial, operational, or contractual information. Financial and management information must faithfully reflect the reality of operations conducted.

3.4. Conflicts of Interest

All persons connected to ubimia® must avoid situations in which personal interests may interfere with professional decision-making.

Any possible conflict must be reported immediately to the Compliance Officer.

3.5. Whistleblowing Channel and Protection of the Informant

ubimia® makes available to its stakeholder groups a publicly accessible Whistleblowing Channel, managed through an independent external platform.

The channel allows:

- Confidential or anonymous communication.
- Objective investigation.
- Protection against reprisals.
- Traceability of the process.

Communications may be made through:

- The corporate web channel.
- The external platform established for this purpose.

ubimia® guarantees that no reprisals will be taken against those who, in good faith, report possible breaches.

The channel complies with the requirements established in Law 2/2023, regulating the protection of persons who report regulatory infringements and the fight against corruption.

All communications received shall be analysed objectively and independently, guaranteeing the confidentiality of the process and respect for the rights of the persons involved.

3.6. Disciplinary Measures

Breach of this Code may result in the adoption of disciplinary measures in accordance with applicable employment law and the severity of the facts.

Failure to comply with the obligations set out in this Code of Ethics may give rise to disciplinary, civil, or criminal measures, including contractual termination and summary dismissal where appropriate, without prejudice to any external liabilities that may arise.

3.7. Competition Law Compliance

ubimia® competes in the market through the quality of its services, innovation, and client trust. Its activity is conducted in full compliance with the competition defence and unfair competition regulations applicable in each jurisdiction in which it operates.

3.7.1. Prohibited Conduct

The following are expressly prohibited for all persons connected to ubimia®:

- Agreeing with competitors on prices, margins, discounts, commercial terms, or any other competition variable.
- Dividing clients, geographical markets, activity segments, or tenders with competitors.
- Exchanging competitively sensitive information with competitors (prices, costs, margins, commercial strategies, investment plans, individualised client data).
- Coordinating bids in tendering or competitive procedures (submission of cover or accommodation bids).
- Imposing on clients, suppliers, or distributors commercial terms contrary to competition law.
- Engaging in unfair competition practices, denigration, or commercial deception.

3.7.2. Caution at Sector Meetings

Participation in trade associations, trade fairs, conferences, and sector working groups shall be conducted with prudence. If any matter arises at a meeting that could compromise competition rules, the ubimia® representative shall express disagreement, leave the meeting, and report the matter to the Compliance Officer.

3.7.3. Advice and Consultation

Should any doubt arise regarding the application of these rules (horizontal commercial agreements, exclusivity clauses, information exchange in due diligence, joint ventures, etc.), the Compliance Officer or external legal counsel must be consulted prior to taking the decision.

3.7.4. Consequences

Infringements of competition law may give rise to administrative, civil, and criminal liability for ubimia® and for the persons who commit or condone them.

The disciplinary measures provided for in this Code shall apply according to the severity of the conduct.

4. Relationship with Our Stakeholders

4.1. Clients

ubimia® bases its relationship with clients on trust, clarity, and professional responsibility.

We commit to:

- Providing truthful and comprehensible information.
- Offering solutions aligned with the client's actual needs.
- Avoiding misleading commercial practices.
- Protecting personal data and strategic information.
- Acting with diligence and technical rigour.

The quality of the service is measured not only by the outcome, but by the manner in which it is delivered.

4.2. Team Members

The people who make up ubimia® are the cornerstone of our activity. ubimia® guarantees working conditions that comply with the applicable regulations on working hours, rest, remuneration, safety, and health at work, promoting a safe and healthy working environment.

ubimia® will promote continuous training and the development of professional skills, facilitating learning opportunities that contribute to individual growth and to the strengthening of the organisation.

We promote:

- Safe and respectful working environments.
- Equal opportunities.
- Continuous professional development.
- Open and constructive communication.

The following shall not be tolerated:

- Discrimination on grounds of gender, age, origin, religion, sexual orientation, disability, or any other personal characteristic.
- Harassment in any of its forms.
- Intimidating or degrading conduct.
- Respect is non-negotiable.

Social Dialogue and Participation:

ubimia® respects the right of workers to representation and social dialogue in accordance with current employment law.

The organisation recognises the importance of collective bargaining where applicable and promotes communication and consultation channels that facilitate the active participation of team members in matters affecting their professional environment.

ubimia® guarantees that communication with workers or their representatives shall be conducted in a constructive, transparent, and respectful manner.

Where legislation so requires or formal representation exists, ubimia® shall facilitate communication with workers' representatives, guaranteeing access to the information necessary for the exercise of their functions.

4.3. Suppliers and Partners

Supplier selection shall be carried out using objective, transparent, and professional criteria.

ubimia® promotes responsible and sustainable commercial relationships.

In the selection and evaluation of suppliers and partners, objective, ethical, and sustainability criteria shall be taken into account, including the assessment of risks associated with regulatory compliance, business integrity, and respect for Human Rights.

ubimia® may include specific contractual clauses permitting the termination of the commercial relationship in the event of serious breaches in ethical, legal, or sustainability matters.

We expect our collaborators to act in alignment with good governance standards and ESG principles.

Commercial relationships based on favours, improper consideration, or personal influence shall not be established.

4.4. Public Authorities

Las relaciones con las Public Authorities se desarrollarán con respeto institucional y cumplimiento estricto de la legalidad.

The following are expressly prohibited:

- Any form of bribery or improper payment.
- The use of influence to obtain advantages.
- Making contributions intended to condition administrative decisions.

4.5. Society and the Environment

ubimia® integrates sustainability criteria into its business activity, promoting:

- Efficient use of resources.
- Reduction of unnecessary consumption.
- Responsible digitalisation.
- Proper waste management.
- Internal awareness-raising on environmental matters.

Sustainability forms part of our corporate responsibility and governance model.

ubimia® commits to compliance with applicable environmental regulations and to the continuous improvement of its environmental performance, integrating efficiency and impact reduction criteria into its internal processes and strategic decision-making.

5. Protection of Information and Assets

All of ubimia®'s assets, tangible and intangible, must be used exclusively for professional purposes.

This includes:

- IT equipment.
- Technological systems.
- Internal information.
- Strategic documentation.
- Intellectual property.

Improper use, unauthorised reproduction, or disclosure of confidential information is prohibited.

Information security is a shared responsibility.

6. Supervision, Monitoring, and Update

This Code:

- Shall be supervised by the Compliance Officer.
- Shall be reviewed periodically to ensure its regulatory adequacy.
- Shall be updated whenever legislative or strategic changes so require.

Management shall ensure the proper dissemination and effective application of this Code throughout the organisation.

In the event of conflict between applicable rules, ubimia® shall apply the strictest criterion or standard with regard to integrity and the prevention of corruption.

ubimia® may carry out internal assessments and periodic reviews of compliance with its commitments on ethics, labour practices, and human rights, adopting corrective measures when necessary.

7. Acceptance and Commitment

All persons connected to ubimia® must:

- Be familiar with the content of the Code.
- Comply with its principles.
- Actively collaborate in its application.

Acceptance of the Code may be formalised by express declaration and shall be integrated into the organisation's internal processes.