

hiberus

CODE OF ETHICS

2024

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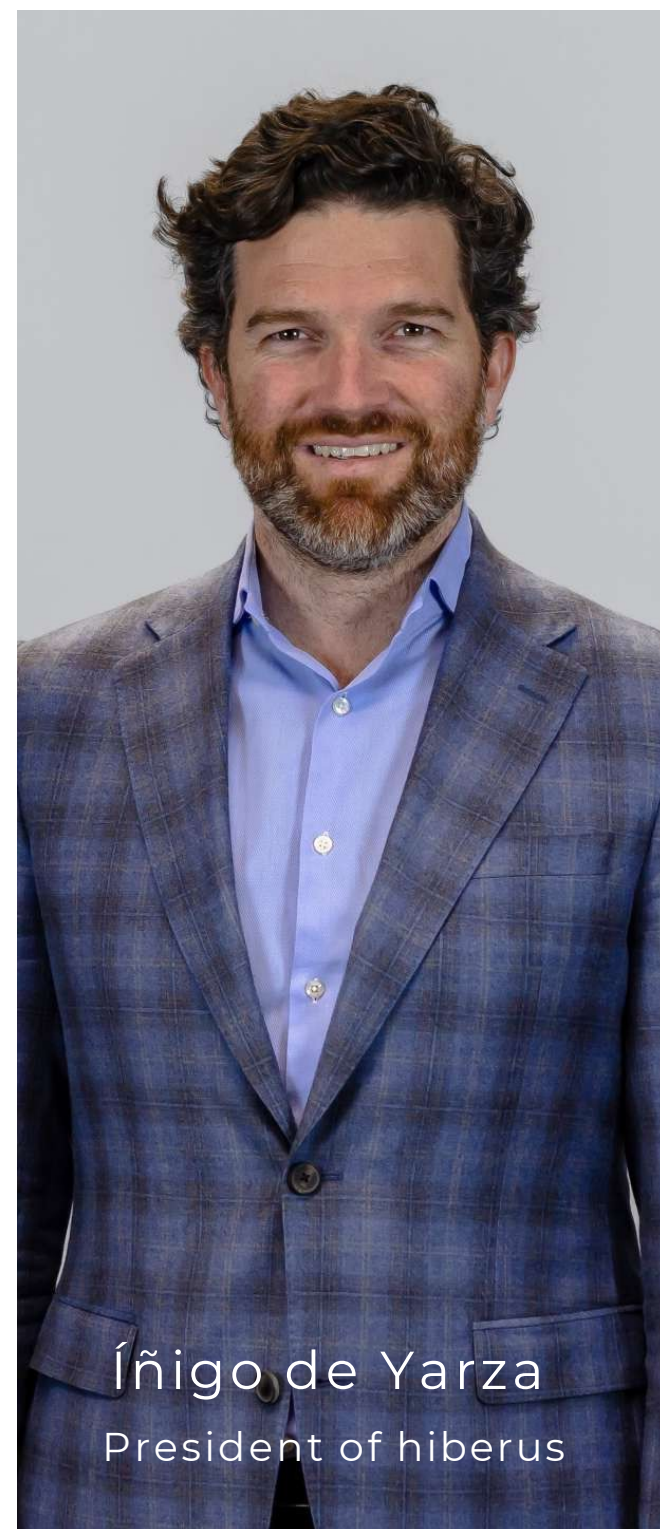
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1. MESSAGE FROM PRESIDENT

1. Message from the President



[hiberus](#) is one of the leading technology consulting companies with 100% private capital of Spanish origin. We are specialized in providing business consulting, technological development, digital transformation and outsourcing services. We are a benchmark for many public and private entities in which today, thanks to our work, they consider us as their main partner when it comes to solving (hand in hand with technology) their business-related needs and processes. We understand and assume with great satisfaction and awareness the global responsibility that we have in all our actions.

The technology sector is dynamic and constantly evolving, driving innovation and development, and for this reason, technology companies play a crucial role in creating solutions that improve efficiency, connect people and people and open up new opportunities for economic and social growth.

In line with this power and scope, our main objective is to act ethically and respectfully towards all stakeholders, including customers, employees, business partners and society at large.

At [hiberus](#), we understand that our work not only influences the present, but also shapes the future of technology and its impact on the world. This Code of Ethics is set out as a framework to guide our behaviour, ensuring that our actions reflect our core values and principles.

With this document we want to share our Code of Ethics, which, based on the idiosyncrasy of [hiberus](#), constitutes the framework on which we will develop our specific policies.

2. #h ETHICS

2. #h Ethics

Our Code of Ethics is based on the principles and values on which hiberus is founded and provides guidelines that will guide us in our daily work, committing ourselves to act with integrity and responsibility in compliance with the law.

At hiberus, we adopt transparent and ethical governance practices, ensuring that all our operations are conducted with integrity and responsibility within the framework of the law. We are committed to sustainability in the environmental, social and governance fields.

We strive to lead by example, demonstrating that it is possible to combine economic growth, innovation and value creation with ethical and responsible behaviour.

The present Code of Ethics is part of Hiberus's Criminal Offense Prevention Model, and its compliance is mandatory for all individuals who lead, work, and collaborate with the company. Regulatory compliance is a fundamental prerequisite of this Code.



Since hiberus's inception, we have been committed to acting at all times in accordance with the legislation in force in each of the countries where we operate. Therefore, those of us who work at hiberus must comply with all laws, whether international, national, regional or local.

In addition to ensuring compliance with applicable laws, we must act in accordance with the internally established rules and procedures, as well as those that may be developed in the future. In any case, our internal regulations are subject to the aforementioned provisions of current legislation.

Failure to comply with the above may cause significant harm to hiberus, including financial penalties, bans on contracting with public entities, disruption of our business relationships, and damage to our reputation.

2.1 Object and scope

The [hiberus](#) Code of Ethics applies to all employees and managers of the company, regardless of their hierarchical position. This scope is not limited to the aforementioned, but also extends to private or public contractors, suppliers and business partners who adhere to it. This Code of Ethics is binding. Compliance with it is mandatory and represents a firm commitment by all those to whom it applies.

No person, regardless of level or position, is authorised to ask anyone working at [hiberus](#) to contravene the provisions of this code, nor can improper or illegal conduct be justified by citing a superior order.

This Code of Ethics is an integral part of the company's Criminal Offense Prevention Model, and its compliance is binding for all those who work and collaborate with it.



DO YOU HAVE DOUBTS ABOUT WHETHER A CONDUCT OR DECISION IS ALINGS WITH OUR CODE OF ETHICS?

Consider the following:

- **Conduct or decisión** contrary to the law: Could it be illegal?
- **Conduct or decision contrary to our values:** can it violate this Code of Ethics and the values it is based on?
- **Conduct or decision that could affect third parties:** for example, can you each a contractual commitment?
- **Do no harm:** can I harm, for example, our people or **hiberus**?

If you believe that your conduct is included in any of the above, not do it. If you are not unsure, you can talk to your superior, or directly use the Ethics Channel to which is accesible to all employees, candidates, former employees, managers, directors, suppliers, customers and third parties related to the **hiberus** Group have access, and which is responsible to the Compliance Committee (hereinafter also "CCO"), a collegiate body, under the Board of Directors.

[/https://hiberus.canaletico.app/inicio](https://hiberus.canaletico.app/inicio).

2.2 Our values

Our values are the essence of our identity. They are the pillars that inspire us to reach higher goals and maintain a business model that is synonymous with integrity and excellence in everything we do.

We ensure to maintain and reinforce our values, carrying the following as the foundation of our company:

- We are committed to agility
- Customer driven innovation
- Exploiting opportunities
- Technological specialisation
- Good People and and People who are Good
- Teamwork
- Commitment



3. WE CARE WITH #h

3. We care with #h

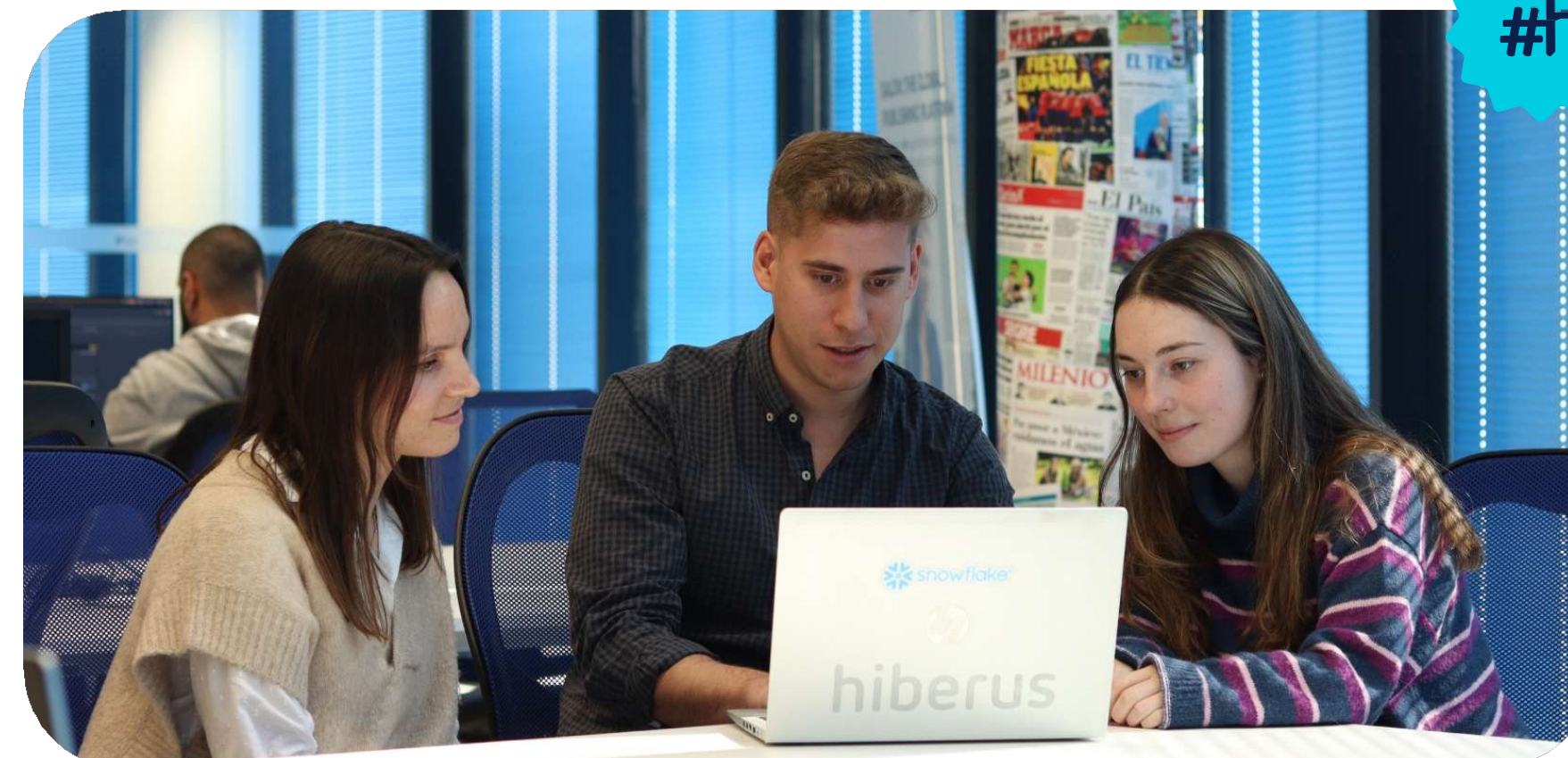
Bilateral and reciprocal relationship of rights and duties

At hiberus, we recognise that the relationship between the company and our team is based on a structure of rights and duties that is both bilateral and reciprocal. This balance is fundamental to fostering a fair, respectful and productive working environment.

In our Code of Ethics we set out clear principles to ensure the comprehensive protection of our company, our people and all our information. These guidelines are essential to maintaining integrity, security and trust in our operations and relationships. The specific policies for each area of protection are detailed below.

3.1 We take care of our people

At hiberus we understand the importance of the people who make up our company. They are the voice and the brand of the company. We have UNIQUE PEOPLE, involved and committed, who make the difference. That's why it is essential to maintain the following commitments, since people are the main people RESPONSIBLE FOR THE SUCCESS OF hiberus.



3.1.1 General principles

Principles of Non-Discrimination and Equal Opportunities,
Respect for Dignity, Integrity, and Privacy.

We promote non-discrimination based on race, color, nationality, social origin, age, sex, marital status, sexual orientation, ideology, political opinions, religion, or any other personal, physical, or social condition, as well as equal opportunities.

In particular, we are strong advocates for equal treatment between men and women regarding access to employment, training, professional advancement, and working conditions. As a testament to this commitment, the company's first Equality Plan was approved in June 2016. Since then, we have continued to implement protocols that foster equality between men and women, as well as tools that ensure and guarantee the company's commitment to this fundamental right.

We must also raise awareness of our staunch defense of non-discrimination based on race, age, disability, sex, gender, or sexual orientation. To this end, we have implemented measures to protect all individuals within our company who may feel discriminated against for any of these reasons.

We implement preventive measures and reject any manifestation of violence, physical, sexual, psychological, or moral harassment, abuse of authority in the workplace, or any conduct that creates an intimidating or offensive environment for personal rights at [hiberus](#).

We are committed to maintaining a work environment that respects personal dignity and freedom. Additionally, relationships between employees, companies, and external collaborators will be based on professional respect and mutual collaboration.

We consider the holistic development of individuals to be essential. Thus, [hiberus](#) will support the necessary balance between professional and personal life, ensuring the right to digital disconnection for our staff at the end of the workday.

Labour rights. Health and safety at work

We defend and promote behaviour that is consistent with compliance with human and labour rights and we are committed to applying regulations and good practices in terms of employment conditions, health and safety in the workplace.

All employees are entitled to effective protection in matters of workplace health and safety. Therefore, **hiberus** ensures effective protection against occupational hazards. Likewise, employees are prohibited from consuming substances that could affect the proper fulfillment of their professional duties.

Convinced that communication channels foster greater cooperation, we respect the rights to unionization, association, strike, and collective bargaining. No coercive measures will be allowed to prevent the exercise of these rights.

It is the duty of all employees to immediately report any act or violation that may constitute non-compliance with this regulation to enable corrective actions.



Selection and Evaluation

Our selection criteria are based on the academic, personal, and professional merits of candidates and the specific needs of our company. We evaluate people based on their individual and collective professional performance. We are always aware that at [hiberus](#) we work with Good People, but above all, Good People.



Resources and Tools for Activity Development

We commit to making available to workers the necessary and appropriate resources and tools for the performance of their work.

Without prejudice to the mandatory compliance with specific rules and procedures regarding resources and tools, people of the organization commit to using these resources responsibly. They are to be used exclusively for activities in the interest of the company and must not be used for personal purposes.

The use of the equipment, systems, and software provided by [hiberus](#), including access to and operation of the Internet, must comply with security and efficiency criteria. Any use, action, or function involving these resources that is unlawful or contrary to company policies is strictly forbidden. This includes the use of equipment to run or access illegal software or applications, actions that could harm the company's image or reputation, or accessing, downloading, or distributing illegal or offensive content.

3.1.2 Our Greatest Asset: our People

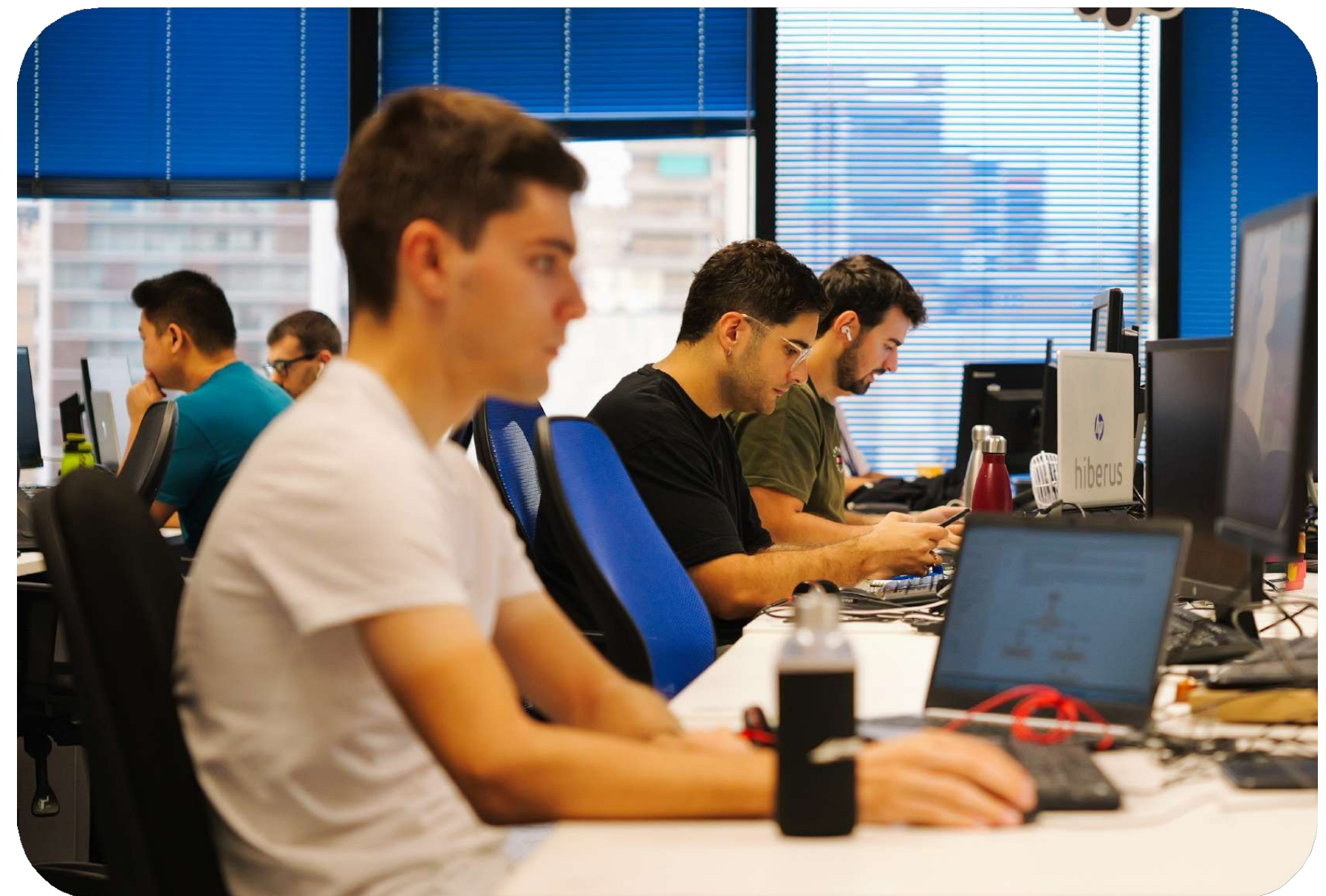
We recognize that the greatest asset and value of our company lies in the people who work here. Thanks to our team, we continue to grow and stand out in a highly demanding market. This growth in value would not be possible without our commitment to the continuous training of our professionals, which contributes to their professional development and the achievement of the company's goals.

The technological field is one of constant evolution and change, driven by rapid advances in research and the development of new technologies. Every day, innovations emerge that transform how we live, work, and communicate. This dynamic of continuous change requires companies and professionals to stay updated and adapt quickly to seize new opportunities and address emerging challenges. In an increasingly digitalized world, staying at the forefront of technology is not just a competitive advantage but a necessity for long-term success and sustainability.

All [hiberus](#) employees have the duty to actively participate in the training plans made available to them. They are expected to engage in their development, keeping their knowledge and skills up to date to add value, promote their professional growth, and achieve excellent performance.

Those in leadership or managerial roles must facilitate the development and professional growth of their team members.

GROW BY HELPING OTHERS GROW.



3.1.3 We actively listen to our people

At **hiberus**, we encourage an atmosphere where everyone feels secure and supported in expressing their concerns and issues. If anyone faces a situation they believe contradicts the values and norms of this Code of Ethics, the following procedure should be followed:

1. Identifying the Issue:

The employee should clearly identify the problem or inappropriate behaviour, whether it involves ethical concerns, non-compliance with internal policies, or actions that are inconsistent with the company's principles.

2. Reporting the Issue:

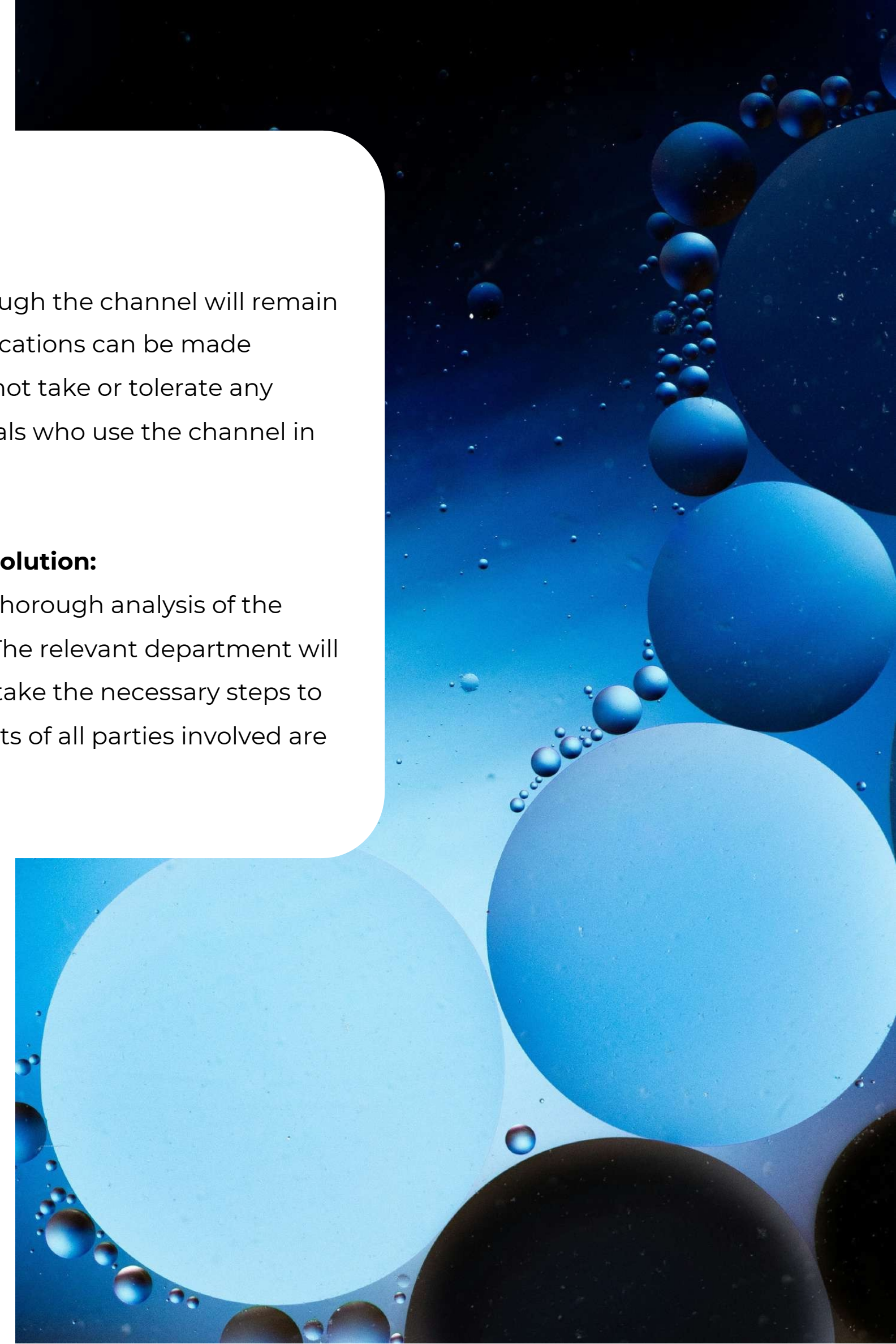
The company provides various channels to report issues that may arise during daily activities.

1. Employees can speak with their supervisor.
2. Use the tools provided by the People or Human Resources departments.
3. Alternatively, they can directly use the Ethical Channel, accessible to all employees, candidates, former employees, management staff, board members, suppliers, clients, and third parties associated with the Ethical Channel is managed by the CCO.
(<https://hiberus.canaletico.app/inicio>).

All information shared through the channel will remain confidential, and communications can be made anonymously. **hiberus** will not take or tolerate any retaliation against individuals who use the channel in good faith.

3. Investigation and Resolution:

Upon receiving a report, a thorough analysis of the matter will be conducted. The relevant department will evaluate the situation and take the necessary steps to resolve it, ensuring the rights of all parties involved are respected.



3.2 We care of our company

3.2.1 The image of hiberus is built by all of us

At [hiberus](#) we are fully aware and proud of the people who make up our company, building a great team of Good People and Good People. Therefore, their day-to-day conduct represents values and idiosyncrasies of our company. Every employee is part of [hiberus](#) and contributes significantly to the success and reputation of our ganisation and it is essential that everyone is committed to maintaining and strengthening our corporate image. This includes acting with the highest integrity and professionalism in all interactions, complying with internal regulations and policies, as well as representing the company appropriately both in and outside work environment. By caring for our reputation and adhering to the highest ethical standards, we ensure that [hiberus](#) remains a trusted and respected leader in the marketplace.



3.2.2 We promote loyalty and integrity

We deeply value the loyalty and integrity of the people who work at [hiberus](#). We understand that situations may arise where personal or external interests may appear to conflict with those of the company. In such cases, we aim to foster an environment of transparency and open communication, where any potential conflicts can be discussed and managed fairly. By acting loyally towards [hiberus](#) and being transparent in situations that could involve a conflict of interest, we contribute to building a culture of trust and mutual respect. We are here to support you in these processes and ensure that decisions are made appropriately.





ACTING WITH LOYALTY TO HIBERUS IMPLIES:

- 1.** We do not compete with **hiberus**, neither by having our own business nor by providing information to the competition.
- 2.** We do not use **hiberus** property or information, nor our position, for personal gain (nor for the benefit of our relatives or friends).
- 3.** We do not take advantage of opportunities discovered through the use of **hiberus** property and information or through our position in **hiberus** for our benefit (or for the benefit of our relatives or friends).

How should we act in the face of a potential, real, or perceived conflict of interest?

The growth of our company is based on trust-based relationships. Conflicts of interest represent a risk that can break this trust. Failing to avoid or properly manage a personal conflict of interest can have serious consequences, both for **hiberus** and for you.

We understand that a personal conflict of interest can arise in a variety of situations. Every member of **hiberus** is trained to identify when a conflict of interest may exist. Therefore, it is important to use your common sense to identify a potential, real, or perceived conflict of interest.

Once the issue is identified, **COMMUNICATE** with complete confidence to the Compliance Committee (CCO) if you believe or have doubts about whether your concern may lead to or constitute a conflict of interest.



EXAMPLES OF SITUATIONS THAT MAY CONSTITUTE A PERSONAL CONFLICT OF INTEREST INCLUDE:

- 1.** Own or family investments
- 2.** Activities outside the organisation
 - Membership on boards of directors or advisory committees
 - Charitable activities
 - Starting a business or additional employment outside hiberus
- 3.** Family or personal relationships

3.3 We care for the environment

At [hiberus](#), we recognize the crucial importance of protecting and preserving the environment to ensure a sustainable future and the well-being of current and future generations. Our commitment to environmental protection is an integral part of our business strategy and is reflected in our daily practices and the way we operate.





GOOD ENVIRONMENTAL PRACTICES OF HIBERUS

- ✦ To ensure the protection of the environment, working in a respectful way, preventing pollution and minimising environmental effects.
- ✦ To positively influence the environmental performance of our customers and stakeholders.
- ✦ Practice the sustainable use of natural resources and materials, as well as promote the efficient use of energy, waste reduction, reuse and recycling practices.
- ✦ Maintain the awareness and sensitization of our staff, promoting their environmental training and encouraging their active participation, including the suggestions for improvement proposed, with the aim of guaranteeing continuous improvement.
- ✦ Motivate research and the development of projects committed to the environment.
- ✦ Measure the carbon footprint and establish actions to combat climate change.
- ✦ Minimise environmental impact by reducing paper consumption to zero.

4. WE PROTECT OUR #h ASSETS

4. We protect our #h assets

4.1 Information confidential

What is confidential information?

Confidential information is any information or material which is not normally available to the public and which it is desirable to keep protected from unauthorised access. Its unauthorised disclosure may result in harm or damage to the person or entity that possesses it. The protection of confidential information is essential to safeguard the privacy, security and integrity organisations and individuals.

At [hiberus](#), we believe that obtaining and making good use of information is a competitive advantage, so its administration and management must be responsible, secure, objective and in accordance with the law.

The following is considered to be, but not limited to, information confidential or privileged:

- Accounting information and financial projections Mergers, acquisitions, joint ventures, expansion plans and business plans.
- Securities transactions and financing, Commercial and operational policies and practices, Judicial or administrative disputes or Organisational changes
- Research and development of new products or services.
- Personal information of [hiberus](#) employees
- Intellectual and industrial property, such as source code Trademarks, patents and copyrights
- Customer and supplier lists, structures and policies of prices.



Handling of confidential information

We at hiberus have an obligation to protect the information and knowledge generated by the organization, in particular:

1. Staff and management personnel shall refrain from using for their own benefit any data, information or documents obtained in the course of their professional activity. Nor shall they communicate information to third parties, except in compliance with applicable regulations, company rules or when expressly authorised to do so.
2. They shall not use data, information or documents of a confidential nature originating from a third company without its written authorisation.
3. We at hiberus undertake to maintain confidentiality and to use any data, information or document obtained during the exercise of our responsibilities in accordance with the internal regulations on the subject.
4. Unless we are instructed , the information we have access to must be treated as confidential and may only be used for the purpose for which it was obtained.
5. We shall not duplicate, reproduce or make any use of the information other than that necessary for the performance of the tasks and we shall not store it in information systems not owned by the company, except in the cases and for the purposes expressly authorised.
6. The obligation of confidentiality shall continue after termination of employment and shall include the obligation to return any company related material in the employee's possession at the time of termination of his or her employment.

Any reasonable indications of leaks of confidential and/or proprietary information shall be reported to the person responsible for information security or to the Compliance Committee (CCO).

4.2 Data Processing

At [hiberus](#) we take care to respect the personal and family privacy of all those to whose data we have access. Therefore, in all cases, we comply with current legislation on data privacy. In order to ensure compliance, [hiberus](#) has decided to appoint a DPO AT GROUP LEVEL, that is to say, a Data Protection Delegate for the whole [hiberus](#) Group, whose communication channel is dpo@hiberus.com. The use of data must be in response to specific and justified requests and we undertake to use the data in accordance with the purpose authorised by the consenting party.

Both employees and the company must strictly comply with the internal and external rules established to ensure the proper handling of information and data provided to the company by third parties.

Furthermore, all internal procedures are implemented with respect to the storage, custody and access to data and are intended to ensure the different levels of security required according to the nature of the must be known and respected. Employees shall report to their superior or to the DPO any incident they detect related to the confidentiality of information or the protection of personal data.





EXAMPLES OF PERSONAL DATA:

* **Direct identifiers:**

- Full name
- Identity card number (ID card, passport, etc.)
- Social security number
- Personal e-mail address
- Telephone number

* **Indirect identifiers:**

- IP address
- Cookies that can track an individual
- Geographical location data
- Biometric data (e.g. fingerprints, facial recognition)
- Images or video recordings where a person can be identified

* **Sensitive data (special categories of data):**

- Information on racial or ethnic origin
- Political views
- Religious or philosophical beliefs
- Trade union membership
- Health data (medical history, health conditions)
- Genetic data
- Data concerning a person's sexual life or orientation

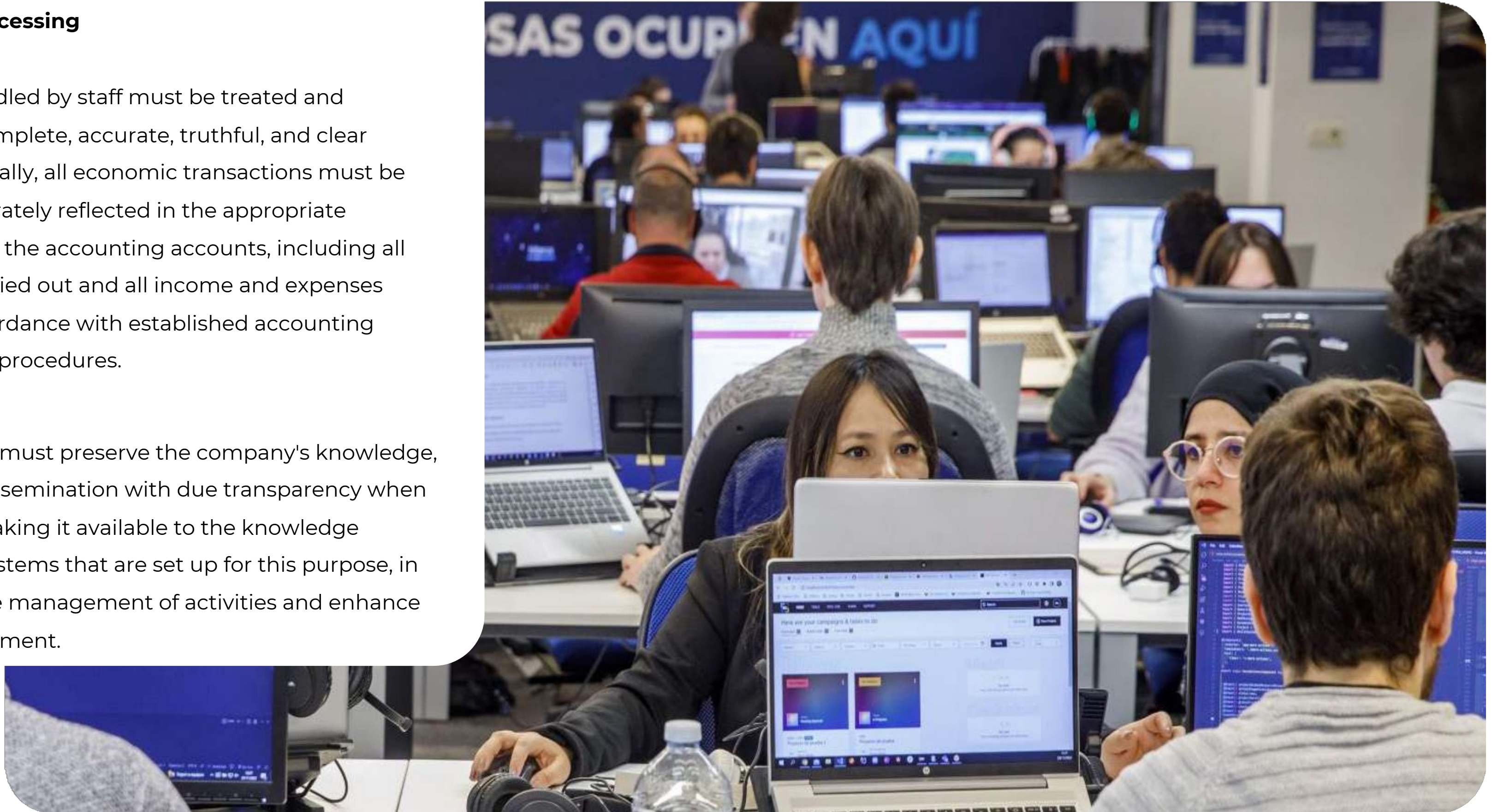
* **Economic and professional data:**

- Financial information (bank accounts, credit cards)
- Employment data (employment history, salary)
- Academic information (grades)

Information processing

Information handled by staff must be treated and recorded in a complete, accurate, truthful, and clear manner. Specifically, all economic transactions must be clearly and accurately reflected in the appropriate records, through the accounting accounts, including all transactions carried out and all income and expenses incurred, in accordance with established accounting and contracting procedures.

In addition, they must preserve the company's knowledge, facilitating its dissemination with due transparency when required, and making it available to the knowledge management systems that are set up for this purpose, in order to facilitate management of activities and enhance people's development.



4.3 Industrial and intellectual property

At [hiberus](#) we deeply value industrial and intellectual property as essential asset for our innovation and success. We are committed to respecting and protecting industrial and intellectual property rights, both our own and those of third parties.

Our ethical approach in this area ensures integrity and respect in all our activities related to the creation, management and use of intellectual property.

[hiberus](#) owns the ownership and the rights of use and exploitation of the software and computer systems, equipment, manuals, videos, projects, studies, reports and other works and rights created, developed, improved or used by its employees, within the framework of their work activity or based on the company's computer facilities.

The only exception to the above is the explicit transfer of ownership to our client, as stated in each contract.

We encourage a culture of innovation and creativity within [hiberus](#). We support the registration and protection of new developments and creations made by our team and do not allow any action to infringe the industrial and intellectual property rights of third parties.



5. WE COMMIT TO THE MARKET #h

5. We commit to the market #h

5.1 Fair competition

At [hiberus](#) we believe that respect for principles of free and fair competition is fundamental to building lasting relationships with our customers, suppliers and competitors. Fair competition not only fosters a healthy business environment but also ensures that our customers and competitors are able to compete in a fair and competitive environment.

The principles governing our commitment to fair competition are as follows:

a. Transparency and accuracy of information:

- We are committed to providing clear, accurate and truthful information about the company and our technology products and services. We ensure that our specifications, features and benefits are faithfully represented in all our communication and advertising.

b. Respect for competition:

- We maintain a fundamental respect for our competitors, avoiding unfair practices such as defamation or disclosure of confidential information.

We encourage healthy and fair competition based on quality, innovation and competitiveness, not unfair tactics.

c. Ethical business practices:

- We adopt fair business practices in all our business transactions and relationships. This includes negotiating contracts honestly, honouring established agreements and acting with integrity in all our business interactions.

d. Prohibition of collusion:

- It is strictly prohibited to agree, coordinate or collude on prices, rates or conditions of sale with competitors. This practice includes minimum, maximum or uniform prices that limit competition and harm consumers. Collusion to manipulate prices adversely affects the market and is contrary to competition law.

At [hiberus](#) we are committed to complying with the laws in force on industrial and intellectual property, unfair competition and antitrust in each and every country in which we operate.

5.2 Zero tolerance for corruption

Our position as a company on corruption, sometimes included under the term bribery, is clear: we reject any form of corruption, joining our efforts to fight it in all its forms.

Integrity is the foundation of our governance, it guides our relationship with customers, partners and employees, and we work tirelessly to ensure that all our actions comply with all anti-corruption laws.

All of us at [hiberus](#) must act with due diligence, we must strictly abide by anti-corruption laws regardless of local customs or business rules. Even if our competitors resort to bribery or make dubious payments, we at [hiberus](#) maintain a zero-tolerance policy for bribery or any act that violates such laws.

We do not give or accept bribes

We are opposed to influencing the will of outsiders to obtain any benefit through the use of unethical practices. Nor will we allow other persons or entities to use such practices with our employees.

The people who form part of [hiberus](#) cannot give or accept: gifts, favours, presents... in general anything that has value for the person that someone is trying to influence, whether it has commercial value or not, in the development of our professional activity.





Exceptionally, the giving and acceptance of gifts and presents shall be permitted when the following circumstances are present at the same time:

- It has a fair value and is appropriate in the circumstances.
- Respond to signs of courtesy or usual customary business; and
- Are not prohibited by law or generally accepted business practices and, in particular, by our policies and/or those of the recipient employer.

hiberus employees may not, either directly or through an intermediary, offer or grant or request or accept unjustified advantages or benefits for the immediate or indirect purpose of obtaining a benefit, present or future, for the company, for themselves or for a third party.

When there are doubts as to what is acceptable, the offer should first be discussed with the Compliance Committee (CCO), either through internal communication channels or through the line manager.

5.3 Honesty, transparency in communication and contractual compliance

At [hiberus](#) we emphasise the fundamental value of honesty in all interactions with third parties. We are committed to communicating with integrity while maintaining transparency in our dealings with customers, suppliers, partners and any other stakeholders. This means providing accurate and truthful information, avoiding any form of deception or misrepresentation, and honouring all promises and agreements made. Our goal is to build relationships based on mutual trust, ensuring that all of our business practices are fair and ethical. Any form of dishonesty or lack of transparency will not be tolerated and will be dealt with in accordance with our internal policies and procedures. We are therefore firmly committed to **honouring our contractual commitments**.

The promotions and sales pitches we use at [hiberus](#) are free of false information. We must offer our products and services honestly and accurately. Using misleading or dishonest practices is a violation of our Code of Ethics and will not be tolerated.



Our intention is to provide those we deal with in the market with complete, transparent, understandable and accurate information, so that they can make informed and autonomous decisions.

5.4 Customer Focus

5.4.1 Commitment to our clients

For **hiberus**, the customer is a fundamental part of our business, which is why it is extremely important to have sufficient empathy. Value creation, initiative and proactivity are cornerstones of **hiberus**. We must provide our customers with the value they do not find in other companies. Commitment and ethical behaviour and personal and professional integrity are our way of understanding and developing our activity.

hiberus is committed to treating all our customers fairly, appropriately and within the framework of the free market.

Customer relationships must be conducted within the framework of applicable laws. In the event that we identify that a customer is involved in illegal or unethical acts, this will result directly in the termination of our relationship.

hiberus strongly condemns all terrorist activity and will be particularly vigilant in doing business with new customers who, due to their origin or activities, may belong to groups or companies related to illegal or terrorist activities.

5.4.2 Quality and hyperspecialization

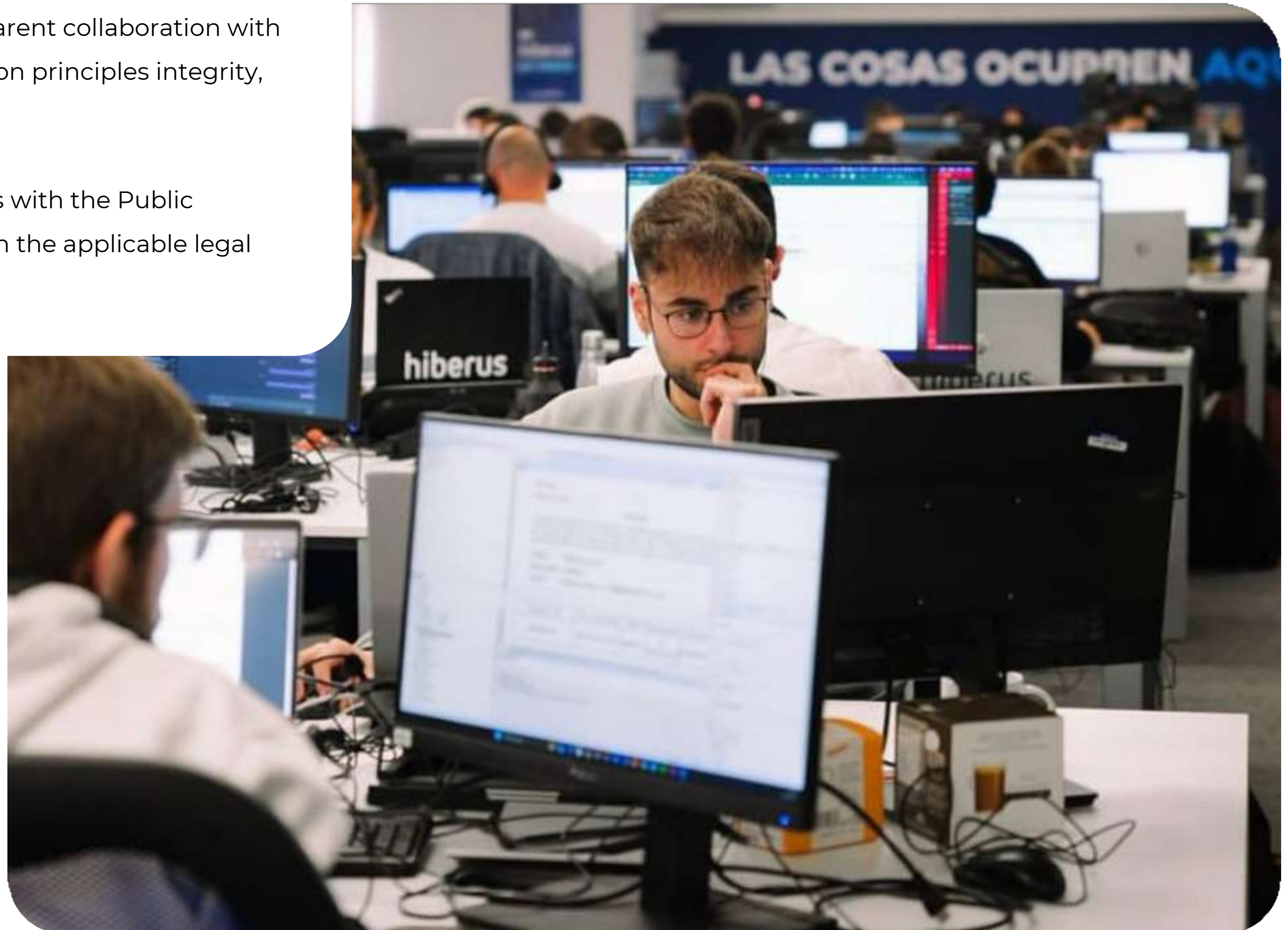
At **hiberus** we concentrate our efforts to be able to offer specialised technological solutions in accordance with our clients' demands. We are committed to the forefront and technological innovation, taking as our standards our commitment to quality and continuous improvement of our processes and services; the certification of management systems based on international standards, guarantee the quality of our products and services and compliance with the requirements of the stakeholders.

5.4.3 Enhancing the value of public-private partnerships for digital transformation

We deeply value public-private collaboration as a key driver of digital transformation and technological advancement. We recognise that the integration of knowledge, resources and perspectives from both sectors is critical to developing innovative and effective solutions that drive progress and respond to emerging societal needs.

We are committed to promoting ethical and transparent collaboration with public and private entities, basing our relationships on principles integrity, mutual respect and shared responsibility.

The principle that will at all times guide our relations with the Public Administrations will be that of strict compliance with the applicable legal system.



5.4.4 Fight against money laundering and terrorist financing

As professionals committed to ethics and legality, we are categorically opposed to any form of money laundering or terrorist financing. It is our duty to act as guardians of financial transparency, ensuring that our activities, and those of those around us, are carried out with integrity.

Money laundering and terrorist financing are connected, as terrorism is often financed by illicitly acquired funds or assets, which are then laundered to make them appear to originate from legal activities.

We are all responsible for reporting, without exception, any suspicious activity. Ethical commitment is collective, and in this fight, omission is our enemy. Any relevant information on intentions or facts of unfair business practices by third parties will be reported in negotiations.



It is an internal rule of [hiberusTechnology](#) not to accept cash payments in order to minimize the risk of committing money laundering offences.



How do we prevent and combat financial crimes?

- **We must know** our partners and customers, identifying any signs of unusual or suspicious behaviour.
- **We deny** any association, direct or indirect, with financial structures designed to conceal, camouflage or disguise funds of illicit origin. Silence in the face of irregularities is also a form of participation.
- **We ensure** the implementation of procedures clear, documented and traceable financial information.
- **We keep** ourselves continuously updated on regulations and preventive practices.

5.5 Suppliers, partners and collaborators

We recognize the importance of maintaining transparent and fair relationships with our suppliers, partners and employees, with the aim of building important bonds of loyalty. We are committed to selecting our suppliers based on criteria of merit and fairness, ensuring that they meet standards of quality, integrity and sustainability that are aligned with our business values. We also foster a culture of ethical and respectful collaboration, in which our interactions with partners and employees are guided by principles of honesty, fairness and mutual responsibility. Transparency in communication and fairness in opportunities are essential to building long-lasting and trusting relationships that contribute to our shared success and the achievement of our ethical and professional goals.

The information provided to the partners shall be objective, transparent, truthful, complete, up to date and shall adequately reflect the company's situation. This maxim shall be complied with particularly scrupulously in relation to financial information.

The fundamental principle of hiberus is the respect of the agreements and commitments established with our suppliers and collaborators.

We also respect intellectual and industrial property rights and therefore staff must establish business relationships with contractors or suppliers who can demonstrate that they are duly authorised to use or market products and services. [hiberus](#) offers its suppliers and external collaborators the possibility of confidentially contacting the Compliance Committee, in good faith, when they believe that the practices of any person in the company are not in accordance with the provisions of this Code.

We also undertake to accept that agreements with our suppliers or partners include clauses compliance with certain ethical, social and environmental standards.



6. ENSURING OF COMPLIANCE WITH OUR CODE OF ETHICS

6. Guarantee of compliance with our Code of Ethics

6.1 Compliance Committee and Ethical Channel

Anyone who believes that a practice is being carried out that may involve a breach or violation of this Code of Ethics should report it through our Ethics Channel (<https://hiberus.canaletico.app/>).

WHO CAN MAKE USE OF THE ETHICAL CHANNEL?

The Ethics Channel is available to all employees, candidates and former employees, management staff, board members, suppliers, customers and third parties who have a relationship with [hiberus](#).

WHAT ISSUES CAN I COMMUNICATE?

- Non-compliance with the Code of Ethics
- Protection of personal data
- Harassment and discrimination
- Money laundering and terrorist financing
- Scam and misleading advertising

- Fraud and Corruption
- Non-compliance Human Rights
- Bad business practices
- Intellectual and Industrial Property
- Health and Safety Risks
- Environmental Risks

HOW WILL MY INFORMATION BE TREATED?

All information you provide is confidential. In addition, you can make your communication anonymously. The Compliance Committee (CCO), a collegiate body reporting to the Board of , is responsible for the Ethical Channel of the [hiberus](#) Group.

WHAT ARE THE CONSEQUENCES OF USING IT?

[hiberus](#) will not take or consent to any retaliation against persons using the channel in good faith.

6.2 Sanctions

All individuals who are part of [hiberus](#) must comply with the principles outlined in the Code of Ethics. Failure to adhere to the provisions stipulated in the Code may result in the imposition of sanctions, in accordance with the disciplinary regime established in the applicable Collective Agreement or legislation for each company. Additionally, if the violation constitutes a crime, the matter will be reported to the appropriate authorities. The commission of any crime will be considered a very serious offense.

This Disciplinary Regime includes, among other measures, the imposition of sanctions. The commission of any crime will be classified as a very serious offense for disciplinary purposes. Any violation may result in sanctions against the individual involved.

For contractors, whether individuals or entities, as well as for engagements through external agencies, this Code will apply as appropriate. In the event of a breach of the Code, it may lead to the termination of their relationship with [hiberus](#).

We are committed to ensuring that everyone at [hiberus](#) shares the values and ethical principles that govern and define our company. For this reason, we must acknowledge our responsibility to abide by the provisions of this Code by signing the Commitment Letter that accompanies the Code of Ethics.

6.3 Approval, validity and review of the Code of Ethic's effectiveness

This Code of Ethics has been approved by the Board of Directors and has an indefinite duration, although it will be reviewed and updated periodically by Compliance Committee, taking into account the contributions received from employees or from interested parties.

The Committee shall draw up an annual report on the monitoring of compliance with the provisions of this Code, and shall recommend, if it deems appropriate, the relevant modifications or measures.

Version	Date	Changes
V0	11/11/2016	Original version
V1	03/10/2018	Change of nomenclature and format
V2	19/12/2019	Editing changes
V3	18/10/2024	Editing and format adjustment

This Code of Ethics is presented in two versions, in Spanish and English, the latter being a translation made with the purpose of facilitating access to its content. In the event of a discrepancy in interpretation between the two versions, the Spanish version shall prevail.

hiberus

[More information](#)