
ETHICAL CODE OF CONDUCT

EXTE

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1. Introduction. Our Code of Ethics

This Ethical Code (hereinafter the “**Code**”) is the basic standard of conduct containing the essential values and principles of integrity, honesty, professional responsibility, trust, fair treatment and full compliance with the applicable regulations that the companies’ employees belonging to the Belmont Corporate Services, S.L. group (hereinafter “**EXTE**” or the “**Company**” indistinctly) intend and agree to achieve and comply with by participating in the Company’s commitment.

This Code is addressed to all directors, managers and, in general, to all Company personnel (hereinafter jointly defined as “**employees**”), regardless of the position they hold within the Company or the territorial area in which they carry out their activities.

It is the ultimate aim of this Code to anticipate, establish and implement premises and criteria based on certain values and principles, which are to govern the ethical behavior of all employees in their daily performance; and which both, the Company and its employees, agree to comply with worldwide. This Code specifies and details these precepts and helps to implement them in a dynamic and continuous way by establishing certain basic non-negotiable principles of behavior applicable to key areas as well as to all Company employees.

This Code complements and constitutes as a guide for action with the purpose of trying to ensure and preserve an appropriate conduct and, to the extent necessary, to preserve the professional performance of its employees, so that it is in line with each countries’ legislation in which the Company carries out its activity, as well as with the established Regulatory System, respecting in all cases and as far as possible, the values of the respective cultures.

Consequently, the provisions of this Code demonstrate the Company’s commitment to the satisfaction and quality of the services provided as a principle that must thrive and prevail in the actions of all employees, whether in their interactions with customers or with third parties outside the Company.

The behavioral guidelines contained in this text are mandatory and affect all subsidiaries or affiliates in which the Company controls or manages, regardless of the territory in which they are located, as well as all employees who carry out their professional activity in them. Thus, this obligation must be in writing and must be communicated at the time of the contractual relationship with new employees and incorporated into the existing employees’ contracts.

Likewise, the application of this Code’s contents may be extended to any third person or organization related to the Company when the Company deems it appropriate, convenient, and necessary, and provided that the nature of the relationship makes it possible.

However, to the extent that the provisions of this Code are not aligned with the local laws of any of the territories in which the Company operates, the actions of employees, as well as internal policies, procedures or protocols, shall in all cases be governed by local laws.

In addition to complying with the applicable legislation in each territory, the Company also emphasizes its commitment to human and labor rights and, by virtue of this, expresses its adherence to and respect for the United Nations Global Compact and the declarations of the International Labor Organization.

For all these reasons, the Code reflects the principle of due diligence for the prevention, detection and eradication of irregularities related to non-compliance with the Code and any other established internal rules. Likewise, it aims to design and implement control models that regularly and periodically analyze the risks envisaged. In order to fulfil its purpose and in parallel, the Code itself establishes mechanisms to ensure awareness of the rules in the organization, define responsibilities and establish procedures that allow for the confidential reporting of irregularities, as well as their resolution.

The conduct criteria set out in the Code are not intended to cover all situations or circumstances that may be faced by Company employees, but rather to establish general guidelines aimed at providing a frame of reference for assessing and guiding the way in which employees act during their professional activity. Therefore, these basic criteria must serve as a reference for all employees, to mark their actions based on mutual respect and commitment to their work, which must be carried out with professionalism, solidarity, integrity and cooperation among employees, as well as with the Company and third parties contracting with it.

Thus, the text should clarify and provide guidance as to the required and desired conduct, however, many of the premises described in the Code are of a general nature.

If the Code does not fulfil its purpose and any employee still needs advice on specific conduct, he or she may refer to a manager or enforcer for guidance or, alternatively, to the policies and procedures applicable in specific areas, as the ultimate and absolute responsibility of all Company employees is to “do the right thing”.

Thus, all actions must be guided by three basic criteria:

- Avoid any conduct that, directly or indirectly, could damage the Company’s business or reputation;
- Act lawfully and honestly;
- Prioritize the Company’s interests ahead of one’s own interests.

2. Scope of Application

This Code shall apply to all natural or legal persons who are part of the EXTE Group, including, without limitation, all employees (as defined above) of each of its subsidiaries.

Respect for the principles, values and ethical conduct contained in this Code shall be extended, as far as possible, to all third parties operating with EXTE.

For the purposes of this Code, “**third party**” shall mean any entity with which EXTE conducts business. They can be suppliers, agents, customers, distributors, business partners, advisors, consultants, contractors, subcontractors, marketing, and sales agents.

The term “**EXTE**” shall include the different companies that make up the Group, whose parent company is “Belmont Corporate Services S.L.”, which has approved these rules. Likewise, all companies that make up the Group, have adhered to it and implement it in their daily activities.

These subsidiaries, as Company’s members, will adapt their policies and procedures to the specific legal requirements applicable to them in each jurisdiction.

3. Conduct Guidelines

3.1 Compliance with applicable legislation

EXTE is committed to submitting and aligning all actions and activities with the applicable laws and regulations in all the territories in which the Company operates, as well as with the internal regulations concerning ethical practices within the Company. In this way, and consequently, all Company employees must comply with the legislation in force in the countries where they carry out their activities.

Thus, regarding ethical conduct, the Guidelines for Multinational Enterprises of the Organization for Economic Cooperation and Development (OECD¹) are taken as a reference, which will be made available for consultation upon request.

At the same time, it is the duty of all Company employees to avoid any action, even if not infringe any regulations, which could damage the Company’s reputation in the eyes of the public opinion of the country, the government or other bodies and adversely affect its interests, or which could be a criminal offence.

¹ the Guidelines for Multinational Enterprises of the Organization for Economic Cooperation and Development (OECD) can be accessed via the following document:
<https://www.oecd.org/daf/inv/mne/MNEguidelinesESPANOL.pdf>

In order to be able to carry out their professional activity with due diligence to comply with this premise, it is all employee's obligation to know those regulations that directly or indirectly affect their work, requesting, in those cases where necessary, the relevant information to carry out such action within the framework of legality. To this end, they can and should contact the appropriate bodies. Thus, honesty and integrity must be the guiding principle in all employees' work in all their actions, ensuring their truthfulness and transparency.

No employee shall knowingly collaborate with third parties in the violation of any law or participate in any action that compromises respect for the principle of legality. In addition to this duty, employees undertake to comply with all internal rules and regulations which, according to them, are applicable in each situation (and which are specific to the Company).

The Company shall provide employees with all necessary means and internal control models to ensure compliance with the law in all territories in which it operates.

Finally, while the Code establishes the Company's adherence to applicable policies and regulations, EXTE reserves the right to revise, adapt or amend any of the provisions contained herein, or in any of its policies, procedures, protocols, or regulations, at any time, so that the provisions herein are aligned with the provisions of applicable law.

3.2 Employees respect. Relations with and among employees.

The Company is committed to the creation and promotion of a safe, respectful, healthy, and optimal workplace in order to provide the best working environment for all employees. Therefore, the personal dignity, privacy and personal rights of each employee shall be respected in the workplace. In this sense, employees are expected to cooperate and participate in the fulfilment of these obligations, as well as in the prevention, detection, and eradication of irregularities in this area, projecting respect for labor rights in their professional actions.

Thus, any manifestation of physical, psychological, moral, sexual, or sexual harassment or abuse of authority, and any conduct that may create an intimidating or offensive environment for the rights of any employee, is completely rejected. Thus, these manifestations are likely to be verbal or non-verbal, visual, electronic, or physical, inappropriate, unwelcome, or offensive.

These manifestations take the form of conduct that may include, but is not limited to, jokes and insinuations and/or requests for unwanted sexual favors; verbal abuse of a sexual nature; body comments, lewd looks, whistling, insulting or obscene gestures or comments; display or circulation at work of sexually suggestive objects or images; and any other physical, verbal, or non-verbal, visual or electronic conduct.

Therefore, relations between Company employees shall be based on professional respect and mutual cooperation, dealing with each other in a fair and respectful manner. Furthermore, at no time shall it be acceptable for employees to behave in a discriminatory manner with respect to origin, nationality, religion, race, gender, age, or sexual orientation, nor should they engage in any form of verbal or physical harassment based on the above.

Anyone who feels that their working environment does not accomplish the characteristics described above should bring this to the Compliance Committee's attention so that it can remedy the situation. The Compliance Committee, having been appointed by the Board of Directors of the Company, will be composed of Antonio Figueroa, Álvaro Pastor, and Laura Abis.

Finally, the Company undertakes to base its policies on respect for the reconciliation of work and family life, as well as on the principle of equality.

3.3 Recruitment budgets

The Company is committed to a principle of non-discrimination in recruitment. All requirement decisions shall be objectively based on personal skills and qualifications and maintain a workplace that promotes equal opportunity without discrimination. The same policy shall apply to promotions or transfers, which shall also be based on decisions based on competencies and job performance, and on the criteria of merit and ability as defined in the job requirements.

Thus, and to provide equal ground in this area, all employees are obliged to actively participate in the training plans provided by the Company in any area deemed necessary for the correct development of their professional activity, thus involving the Company in the development and commitment to train and assist in the professional and personal progress of its employees.

Along the same lines, the Company fosters a working environment in which employees participate in the strategic company's objectives and can develop personally and professionally. Consequently, in order to achieve the commitment and involvement of all employees in the project, they must be informed and be aware of the company's general objectives and, where appropriate, the specific objectives that concern them.

All employees must act in a dedicated and efficient manner, rationalizing their working time, which will contribute to their professional and personal growth. Likewise, they must be personally involved in their professional development, increasing their competences, and permanently updating their knowledge, which they must share with their colleagues.

Finally, the Company also undertakes to maintain minimum and objective requirements when requirement a family member or relative of a Company employee, provided that there is no direct or

indirect employment relationship. These principles of fair recruitment shall also apply to all employment's aspects relationship mentioned above.

3.4 Policies for maintaining health and safety in the workplace

The Company is actively committed to promoting and encouraging the adoption of all occupational health and safety policies necessary for the proper maintenance of the workplace, as well as the adoption of any preventive measures established in the legislation in force in each country in a specific manner, and to constantly ensure compliance with regulations in this area.

EXTE starts from the premise that safety is an individual responsibility and a condition of employment, which is why it will not allow or accept any unsafe behavior that could cause serious damage to people and/or installations.

For the correct fulfilment of this premise, it is all employees' obligation to know and comply with the rules of protection, safety, and health in the workplace, as well as to observe their rigorous compliance, thus ensuring their own safety and, in general, that of all persons who may be affected by their activity.

To this end, the Company undertakes to provide its employees with the resources and knowledge necessary for them to carry out their duties safely and in a healthy environment, as well as to maintain its facilities in optimum conditions for the correct performance of their work.

On the other hand, the Company provides its employees with the facilities, means and tools necessary for the performance of their professional duties, which must not be used for other purposes. Consequently, all employees must use the means and work tools that the company places at their disposal exclusively for the performance of the work activities that each one has been entrusted with, and must not use them for private or other purposes. All employees must make proper use of Company property.

3.5 Irregular payments and money laundering

The Company undertakes to establish and maintain prevention and avoidance policies that are in line with the applicable legislation in force in each territory, ensuring transparency during any of its transactions, of the possibility of irregular payments or money laundering with illicit origins or derived from criminal activities. To achieve this objective, it undertakes to implement specific controls on these economic transactions.

Employees undertake to remain alert to cases that could be considered non-transparent or where there are indications of a lack of integrity of persons or entities with which the Company maintains relations.

In the event that employees have doubts about the transparency or legality of a transaction or action, they undertake to inform the person in charge, and to request information or assistance if necessary. Employees undertake to use the appropriate channel to report any conduct that contravenes the provisions on this subject herein.

For further information, employees may consult the Prevention of Money Laundering and Terrorist Financing Policy, which is available for consultation.

3.6 Best tax practices

The Company's business and commercial activity entails the adoption of a series of decisions that have an impact and incidence in the tax sphere. Consequently, the Company is committed to complying with its tax obligations in all territories and jurisdictions in which it operates, always opting for a prudent tax policy.

3.7 Corporate image and reputation

It is the duty of employees to take the utmost care, as far as possible, to safeguard the image and reputation of the Company in all their professional activities. For this reason, under no circumstances may any employee, regardless of their position, use the Company's image or brand for uses other than those permitted by the Company.

On the other hand, the Company establishes and emphasizes its lack of any type of connection with the financing of any political party, as well as its representatives or possible candidates in all those countries in which it operates.

Any employees' link or collaboration with this type of organizations or individuals shall necessarily be totally unrelated to the Company and its activities and interests. Any such involvement shall be on an individual basis and at the employees' own cost or risk.

3.8 Corporate loyalty and conflicts of interest

EXTE considers mutual loyalty between its employees and the Company itself to be the cornerstone of its business activities. Therefore, it always undertakes to respect the participation of its employees in other financial or business activities, under the premise of their legality, as well as the absence of unfair competition or collision with their responsibilities as Company employees, or with the interests of the Company.

For their part, employees undertake to abide by the limitations established by the Company, as well as those referred to in the applicable legislation. EXTE is therefore obliged to make these restrictions known so that employees can apply them to their activities, if necessary.

Furthermore, it is the duty of employees, in order to achieve the objective of not entering into a conflict of interest with the Company, to refrain from representing the Company and from intervening or influencing decision-making in any situation in which, directly or indirectly, they have or show a personal interest.

In the event that an interest conflict has arisen, or the employee is in a situation that could lead to such a situation, it is the employee's obligation to communicate it so that the situation can be resolved in a fair and transparent manner.

In case of any doubt about the legality of an action or conduct, employees should consult with the Compliance Committee. They shall carry out the activities and perform the external duties at their own cost and risk, exclusively outside their working hours.

Under no circumstances may employees compete with the Company, nor may they under any circumstances use their employment relationship with the Company for personal advantage.

Furthermore, employees must never, either directly or indirectly (through intermediaries), promise or offer any improper personal, monetary, or other favors, seeking to obtain or gain business or other advantage from any third party, regardless of their public or private status.

Employees may not be influenced by receiving favors or attempt to influence others inappropriately by giving favors. Thus, all gifts must be tokenistic and appropriate to the circumstances and in accordance with the Company's Anti-Corruption Code. In the absence of clear guidelines of their own, employees will follow the most restrictive local practice in order to avoid even the appearance of improper dealings. In case of any doubts, the Compliance Committee should be informed.

The Company declares its commitment to compete in the market in an active but fair manner, respecting the free market and antitrust rules established for this purpose. In this respect, all employees must make it a priority to achieve excellence in the quality of service and customer care, managing the fulfillment of the obligations arising from the contracts signed with speed and rigor and striving to attend to and understand customers, anticipating their needs and satisfying them efficiently, to which end they must provide clear and truthful information on products and services.

Accordingly, employees shall place the interests of the company and the customer above their own in any product or service offer made on behalf of the Company. No employee shall provide false or misleading information about competitors or use such information to disparage competitors. No employee shall engage in any practice that is intended to, has the effect of, or has the effect of, preventing, restricting, or distorting competition, and in particular any practice of fixing prices or other trading conditions or sharing the market.

3.9 Information processing and business knowledge

All Company employees have the duty to maintain the strictest confidentiality regarding all confidential information to which they may have access as a result of their professional activity, so that it may not be used or disclosed inappropriately, and to refrain from using it improperly for their own benefit or that of third parties; or that the disclosure of such information may in any case cause damage to the reputation of the Company in any way whatsoever.

Such knowledge includes secret trades, business, marketing and service plans, ideas, designs, databases, records, salary information and any other unpublished financial or other information, as well as any other information that the Company considers and catalogues as such.

In addition, employees have a duty to protect and respect, to the extent possible based on their position in the Company, the Company's assets and to use them only in a proper and efficient manner. Such property shall be protected against loss, damage, misuse, theft, fraud, misappropriation and destruction. Both tangible and intangible assets (such as trademarks, know-how, confidential or proprietary information and computer systems) shall be considered assets. In order to comply with this provision, and to the extent permitted by applicable law, the Company reserves the right to monitor and inspect the manner in which employees handle such assets.

All information and knowledge (understood as the conceptual result of the integration of diverse information, having been generated internally by the Company) is Company's property, in the terms referred to in the legislation in force, in all those territories in which the Company operates.

Consequently, it is strictly forbidden to reproduce, copy, plagiarize, distribute, modify, transfer, or communicate, in whole or in part, any information or proprietary knowledge owned by the Company without the Company's prior written authorization. Likewise, it is also strictly forbidden to reproduce, copy, plagiarize, distribute, modify, transfer, or communicate, in whole or in part, in the event that they are the property of third parties (natural or legal persons) without their prior written authorization.

In the same line, the Company complies with current legislation on data protection in accordance with the national regulations of the territories in which it operates, respecting in all cases and to the extent possible, the right to privacy. Likewise, the Company has all the measures and mechanisms in place to protect the personal data entrusted to it by its customers, employees and other stakeholders or external collaborators.

In this regard, the Company has internally implemented the policies required by the General Data Protection Regulation (GDPR) and is constantly reviewing them to always keep them in line with the new legislation in force. Likewise, and to guarantee compliance with the provisions set forth in the European regulations on personal data protection, the Company has a Data Protection Delegate in charge of minimizing risks in the protection of such data.

All this Code's provisions shall be kept confidential, unless expressly provided for and required by law, or unless prior written authorization has been given in writing by the Company. The obligation described above may survive the termination of the employment relationship. In the event that such information is particularly relevant, this period shall be in accordance with the stipulations of the employee's work contract, which shall be adopted on the basis of objective criteria and has been voluntarily and knowingly accepted by the employee.

The Company respects and understands that third parties involved in its business activity may have a similar interest in the protection of their confidential information. Therefore, such information, if brought to the knowledge of employees, shall be accorded the same status and treatment as the Company's own confidential information mentioned above.

4. Acceptance and Compliance with the Code

All provisions herein are, under all circumstances, applicable to all employees.

Therefore, the Company will communicate and disseminate the content herein to all employees so that it is accessible to all those who are required to comply with it, and so that they understand the importance and scope of this obligation. Furthermore, employees shall formally commit themselves to such compliance at the time they formally become part of the Company, as well as in any novation of contract, or in all renewals of the content of the contract, and in all circumstances deemed appropriate by the Company.

The Company expects a high level of commitment from all employees to comply with the obligations and guidelines set out in this Code, and therefore provides for the possibility of evaluation of this level of compliance. For this reason, any possible non-compliance will be analyzed in accordance with internal procedures, legal regulations, and agreements in force, and if necessary, the appropriate sanctions or even legal action will be taken.

In order to be able to carry out their professional activity with due diligence to comply with this premise, employees undertake to be aware of those regulations that directly or indirectly affect their work, requesting, in those cases where necessary, the relevant information to carry out such action within the framework of legality.

For all these reasons, the Code reflects the principle of due diligence for the prevention, detection and eradication of irregularities related to breaches of the Code.

Therefore, no one, regardless of position or position held within the Company, is authorized to request or require any other employee, whether of the same rank or subordinate, to contravene the provisions

herein or any other legal or internal regulation. Likewise, under no circumstances may ignorance of this Code be used as a justification for such non-compliance.

All Company employees have the duty and the right to report any breach of the contents of this Code, as well as any breach of applicable and current legislation through the Company's Whistleblowing Channel. This Whistleblowing Channel, which the Company has set up internally and whose manager, Laura Abis, has been appointed by the Board of Directors, is completely anonymous and guarantees the safety of whistleblowers so that no reprisals can be taken against them.

5. Implementation and Validity of the Code's Content

This Code shall enter into force on the day of its publication to all employees and shall remain in force until its cancellation is approved.

Likewise, in the event of any revision, amendment or change to the content herein, the updated guidelines shall apply from the day such content is made public to all employees and shall remain in force indefinitely unless otherwise stipulated.

Finally, EXTE informs that this is a free translation into English of the original Spanish document approved by the Board of Directors. In case of contradiction or inconsistency between these two versions, the Spanish text will prevail.