



CODE OF CONDUCT

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Our word

At **Expertware**, we pride ourselves on being a team of dedicated professionals who share a common vision: turning technology challenges into sustainable business opportunities. Our mission is to help companies thrive in a competitive digital world by providing innovative and customized IT solutions that enhance and optimize existing technologies.

This **Code of Conduct** reflects our core values and serves as a guide for every member of the Expertware team. Innovation, quality, partnership, adaptability and team are the pillars on which we base our daily work. In a rapidly changing industry, it is essential that we maintain our integrity, act responsibly and cultivate a collaborative, safe and inclusive work environment.



Each of us plays a critical role in maintaining **Expertware's reputation**, and adhering to this code ensures that we can continue to deliver best-in-class solutions, build trusted partnerships and grow in a sustainable way. We are committed to the highest ethical standards, to working together with respect and transparency, and to contributing to the success of our customers.

I encourage you to use this code as a guide for making the right decisions, promoting behavior that reflects **Expertware's values**. Every employee is asked to abide by these rules, helping to maintain an ethical and professional work environment. Together, we can continue to make a difference and turn every challenge into an opportunity for success.

Scope

This **Code of Conduct** applies to all **Expertware** employees, contractors, partners and collaborators, regardless of position or role. The rules and principles in this document set out our expectations for professional and ethical behavior and apply to both internal activities and external relationships with customers, partners and suppliers.

This code applies to all company activities and locations, both locally and internationally, and covers all forms of communication and interaction, whether direct or virtual. In addition, this code aligns with applicable laws and local regulations in all jurisdictions in which Expertware operates.

Failure to comply with this Code may result in disciplinary consequences, which may include warnings, sanctions and, in severe cases, termination of employment. It is the responsibility of each of us to understand and comply with this Code of Conduct and to report any suspected or observed violations to ensure the integrity and success of the company.

Compliance with this code is mandatory for:



Employees

All members of the Expertware team, regardless of seniority, must comply with the ethical principles and standards set out in this document.



Contractors and collaborators

External persons or entities working on behalf of or in collaboration with Expertware must act in accordance with this code of conduct.



Business Partners and Suppliers

We expect our business partners and suppliers to adhere to similar standards of ethics and integrity in all their interactions with Expertware.



Our mission, vision and values



Technology that makes the difference. Our experts, your solutions.

Mission

At **Expertware**, our mission is to transform our clients' businesses through innovative and customized IT solutions that enhance and optimize existing technologies while creating new opportunities for growth and efficiency. We are committed to delivering successful projects by combining our advanced technical expertise with exceptional interpersonal skills, helping clients thrive and adapt in a competitive digital environment.

Vision

Expertware's vision is to become the preferred IT consulting partner for companies across Europe, renowned for our innovations and our ability to turn technological challenges into sustainable business opportunities. By leveraging our exceptional human resources, we facilitate companies' transition to a successful digital future, promoting excellence and adaptability in a competitive environment.

Our Values



Innovation

We are dedicated to exploring and implementing the most advanced technological solutions, anticipating and meeting our clients' future needs.

Each project is an opportunity to surpass usual practices and bring innovative changes to the industry.

Through our team's creativity, we turn ideas into reality and set new standards.



Quality

We deliver IT solutions that stand out for their excellence and attention to detail, ensuring that every aspect of the project meets the highest standards.

Our commitment to quality ensures that results not only meet but exceed client expectations.

Each delivery reflects our professionalism and thoroughness.



Partnership

We build trust-based relationships with our clients, working closely to understand and address their specific needs.

Our collaborative approach turns every interaction into a successful partnership aimed at achieving common goals.

In every project, we are dedicated to creating solutions that contribute to our clients' long-term success.



Adaptability

We quickly adapt to technological changes and emerging market demands, providing flexible and efficient solutions.

Our proactive approach allows us to successfully address unforeseen challenges and continuously innovate.

Our nearshore resource model enables us to tailor our services to meet each client's unique requirements.



Team

Our employees are the most qualified in the field and our most valuable resource.

Each team member brings deep technical expertise and a passion for excellence, ensuring top results in every project.

We invest in the continuous development of our employees to maintain high standards and address complex challenges.



Principles of conduct



Code of Conduct

The following rules form the basis of Expertware's Code of Conduct and set the standards by which we conduct every aspect of our business, particularly in the areas of compliance and corporate integrity. These principles are essential to preventing any illicit activity and maintaining an organizational culture based on respect, accountability and ethics, addressing issues such as corruption, harassment, human rights violations, tax evasion and other potential misconduct.

At Expertware, we have a duty to communicate the standards of conduct set out in this code to everyone within the organization. Every employee, contractor and collaborator is responsible for reading, understanding and complying with these principles, as well as any additional regulations specific to the country in which they operate.

In this context, managers and team leaders have a responsibility to ensure that all persons under their supervision are made aware of the provisions of this Code. It is crucial that they regularly remind employees of the importance of respecting these principles, ensuring a working environment in which all employees feel safe to raise concerns without fear of reprisal.

1. Compliance with the law

Compliance with and interpretation of laws, both literally and in spirit, is the foundation of **Expertware's** ethical standards. All employees and managers are obligated to respect and follow the laws, regulations and rules of the communities, regions and countries in which we operate while conducting business activities.

Where **Expertware's** internal regulations are stricter than legal standards, all employees are obliged to apply these stricter internal regulations. This approach ensures not only compliance with the law, but also a commitment to the highest standards of ethics and professional responsibility.

2. Respect for human rights

At **Expertware**, we are committed to the highest standards of human rights protection in accordance with the United Nations Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights.

It is essential that in every entity of **Expertware**, irrespective of the country in which we operate, we act diligently and responsibly to prevent, detect and mitigate situations that may compromise human rights.

We aim to ensure that not only our own business context complies with these principles, but also our business partners, thereby promoting a culture of respect and accountability in all our interactions.

3. Equal opportunities

We promote fair and equitable treatment of our employees by providing employment opportunities based on individual merit. We are committed to creating a workplace where diversity is valued and every employee feels respected, valued and included.

4. Commitment against discrimination, bullying, hate and violence

We are committed to treating all people with dignity and respect and will not tolerate any form of bullying, hateful behavior or violence. This policy applies regardless of a person's position or status, whether employee, customer or business partner, within any of our company entities.

We strive to maintain a professional, safe and productive work environment. We prohibit participation in any activity that could result in inappropriate behavior, including by our employees, customers and business partners.

In this regard, **Expertware** strongly condemns and does not tolerate discrimination against employees or candidates based on ethnicity, religion, sexual orientation, national origin, disability, age, genetic heritage, descent, marital status or any other basis protected by national, European or international law.

5. Health and safety obligations

At **Expertware**, we strictly comply with our legal obligations regarding safety, health, protection and hygiene at work. Our aim is to keep staff as safe as possible in all company locations and work areas.

We are committed to creating a healthy and safe working environment in which employees feel protected and supported, thereby contributing to the overall well-being of our team.

6. Zero tolerance for illegal activities

At **Expertware**, we do not tolerate any form of crime, especially corruption, bribery, kickbacks and extortion. It is forbidden to influence or induce others to obtain advantages or favorable treatment, either for **Expertware** or for yourself personally.

This rule applies to any form of payment or consideration, either directly or through others. It also applies if such actions are directed against **Expertware** managers or employees.

We are committed to maintaining a fair and transparent work environment. Any violation of this policy will be treated seriously and may result in disciplinary action, including termination of employment.

7. We do not receive or give gifts of value

We do not receive or give gifts that exceed a low monetary threshold. We only accept gifts of a modest and appropriate nature. We are prohibited from giving or accepting gifts that could influence the outcome of a business transaction or be perceived to have such an effect.

8. We manage finances ethically and accurately

At **Expertware**, we strictly avoid tax evasion as it is illegal and affects public finances. We therefore manage our finances and taxes carefully.

We ensure that money is spent responsibly and that all financial records are complete and accurate. We are prohibited from influencing in any way how these records are managed.

9. We avoid conflicts of interest

Conflicts of interest can damage **Expertware's** performance and reputation. Therefore, employees and management must be careful not to mix personal interests with company interests. It is important to disclose any potential conflicts to their supervisors. This approach applies to both internal and external situations.

10. Outside activities

Expertware employees should not engage in outside activities that are related to competing companies, as they may create conflicts of interest or interfere with their responsibilities and duties within the company. It is essential that any activity outside of Expertware not affect the business or performance of the organization.

11. Protecting material resources and intellectual property

Expertware employees must protect company assets, including physical, intellectual property and financial assets. It is essential to ensure that these resources are not damaged, stolen, misused or wasted.

Confidential information must be protected from unauthorized disclosure. Any violation of this rule will be penalized. Avoid discussing the company in public places, such as public transportation.

12. We handle personal data with care

Expertware carefully handles personal data, ensuring that it is processed in accordance with applicable regulations. All employees handling this data must be familiar with the essential processes of the General Data Protection Regulation (GDPR).

Our company is committed to fully complying with the European Union's GDPR principles for protecting privacy. We have a separate data protection policy and clear procedures and processes to implement these principles.

13. Customer relations

At **Expertware**, employees must treat all customers-whether current or prospective-with the highest standards of business ethics and loyalty. Business arrangements with customers must be handled exclusively by authorized individuals, ensuring that all interactions adhere to the boundaries set by our Code of Conduct.

The Company is committed to promoting its products and services on their own merits in the spirit of fair competition. It is essential that we avoid negative or malicious comments about our competitors, thereby focusing on providing an excellent customer experience and building a solid reputation in the marketplace.

This approach not only strengthens customer relationships, but also contributes to a culture of integrity and respect in business, which is essential to the company's long-term success.

14. Sustainability and the environment

At Expertware, we are committed to conducting all our activities in a sustainable manner, taking care not to compromise the needs of future generations. We seek a balance

between economic growth, social well-being and respect for the environment.

Employees are encouraged to be aware of the social and environmental impact of our projects, adopting habits and best practices that contribute to the company's sustainability goals. It is essential to prevent, mitigate and eliminate negative impacts, thereby promoting a responsible working environment.

Compliance with the Code of Conduct

The Code of Conduct is an essential document with mandatory applicability for all persons and entities within **Expertware**. Compliance with this code is required, and in case of violations, the company will take disciplinary and legal action in accordance with applicable law.

Failure to comply with the Code may result in various sanctions, depending on the nature of the relationship with **Expertware** and the seriousness of the offense. All employees have an obligation to immediately report any failure to comply with the provisions of the Code by informing their direct supervisor or the Human Resources Department.



Summary

The Expertware Code of Conduct represents our firm commitment to professional ethics, integrity and accountability in all aspects of our business. Each team member is instrumental in promoting the stated values and principles, thereby helping to create a healthy, respectful and efficient work environment.

It is our collective responsibility to ensure that we act in accordance with these standards, to support our colleagues and to report any misconduct so as to maintain an organizational culture based on transparency and respect.

Each of us plays a crucial role in **Expertware's** success, and by following this Code, we are committed to building not only a successful company, but also a respected professional community.





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