

Code of Business Conduct (Ethic code)



Barcelona to December 23, 2021

CODE OF ETIC'S INDEX

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INTRODUCTION

The Code of Business Conduct (or Code of Ethics) constitutes a basic pillar of the Organization's Criminal Regulatory Compliance Program that promotes and reflects a positive corporate culture while reflecting the commitment of URBS IUDEX ET CAUSIDICUS, S.A. (hereinafter URBICSA or the Organization) with the principles of business ethics, integrity and transparency.

In addition, it is necessary to specify that although all employees have the responsibility to act ethically, the URBICSA management team has the added commitment to lead by example serving as a model for the rest of the organization.

In conclusion, the objective pursued with the implementation of this Code of Ethics is the recognition of integrity; the ability to make decisions ethically, creating an open work environment in which everyone feels comfortable and can share their concerns; prevent possible reprisals against those who report wrongful acts and, finally, promote the search for help to solve problems and report them.

Likewise, as we have mentioned above, the Code of Ethics facilitates the knowledge and application of the business culture of URBICSA, firmly established in compliance with current legislation and is binding. Such a link includes obligations, which means that the violation of the Code of Ethics and the company policies that develop it will be sanctioned disciplinarily.

On the other hand, the purpose of the Code of Ethics is to improve the reputation of the Organization, giving unity and coherence to the self-regulation system of URBICSA as well as strengthening in those who are part of the organization the sense of belonging and showing third parties their corporate culture.

It should also be added that certain matters covered by this Code will be supplemented by the rules that, in more detail, are specified in the different sectorial codes. The Code of Ethics will also be complemented by company policies that regulate in greater detail specific sectors or a certain activity within the Organization and with the URBICSA Quality book.

Finally, mention that the Code of Ethics takes into account the principle of criminal liability of legal persons and serves as a basis for preventing and mitigating irregular and improper behavior that may determine the criminal responsibility of the Organization.

GENERAL PROVISIONS

Article 1

Scope of application:

The assumption by URBICSA of a Code of Business Conduct represents the express commitment of the Organization to accept criteria of conduct to which it is bound.

Likewise, all persons linked to the organization without difference of the position or responsibility they occupy in URBICSA are recipients of this Code and will have to know and accept its content and be obliged to comply with it at the time of their incorporation into the Organization.

In addition, the Code may also be extended to any natural and/or legal person who maintains legal or commercial relations with URBICSA, which will be covered by the principles of this Code when they are applicable to it.

Article 2

Principles of the Code of Business Conduct (Code of Ethics).

This Code of Ethics constitutes one of the main elements of the management of URBICSA's Corporate Social Responsibility and is the means for the development of its corporate values, which are indicated below:

- Compliance with the law
- Respect for human and labour rights
- Honesty, transparency and trust
- Compliance with the law
- Quality of services and products
- Equal opportunities, professional development and non-discrimination

Article 3

Compliance with the law:

The persons bound by the Code of Ethics undertake to comply with the current legal system, the internal procedures of the Organization and respect the values and principles contained in this Code. In this sense, no one from the organization will consciously collaborate with third parties in the violation of any law, nor will it participate in any action that compromises respect for the principle of legality.

The persons of the Organization shall not obey any order that contravenes the provisions of a rule of law. In case of receiving it, through the channels established in the Organization, they will have to communicate the existence of this type of orders. The action contravenes the criminal legality or the indications or orders that in this sense may give, not offloading

responsibility to those who act following these indications or any situation that could lead to a breach of the principle of legality.

Likewise, the Organization will put the necessary means so that everyone has sufficient knowledge of the internal and external regulations that are relevant to carry out their professional actions.

Article 4

Respect for human and labour rights

URBICSA respects, protects and promotes existing provisions on the protection of human rights. Therefore, all actions of URBICSA and the people who are part of the company will have respect for Human Rights and Public Freedoms in the Universal Declaration of Human Rights, in the Spanish Constitution and in the statute of Catalonia.

The Organization believes in the importance of a job free from harassment and discrimination, while condemning the hiring of forced labour and the exploitation of minors. In order to avoid these situations, a zero-tolerance policy is maintained that favors the violation of fundamental human rights, whatever the relationship with URBICSA. The Organization also emphasizes that the remuneration and benefits paid correspond, at least, to what is established by national legal regulations or by the respective economic sectors..

Article 5

Honesty, transparency and trust The Organization firmly believes that honesty, transparency and trust are three of the fundamental pillars of any business activity. Thus, it is mandatory to respect these three principles in all its commercial relations, especially those maintained with customers, suppliers and other employees.

Everyone who has an employment relationship with URBICSA, must jealously keep respect for the truth, and will avoid hiding information that is considered indispensable so that the people with whom they relate are able to choose freely and with full knowledge of what they are committing. In the same way, the commitments assumed will have to be respected in any case, preserving the trust they have deposited.

Article 6

Fair competition:

The collection of information of any kind should be carried out with particular attention to the provisions that may protect it. In any case, all information that has been obtained inappropriately or through the violation of the confidentiality under which its legitimate owners maintain it will be rejected. In particular, special care will be taken not to violate company secrets, which would constitute a clear exercise in unfair competition.

Likewise, in URBICSA, any disclosure of false or malicious information about the Organization's competitors under any circumstances is prohibited.

Finally, it is worth mentioning that people who are engaged in marketing, sales and purchases or those who have direct and frequent contact with competitors, will have to ensure that they are familiar with the applicable laws on competition and, in case of doubt, should contact the legal area of the company or directly responsible to receive the appropriate advice.

Article 7

Quality of services and products:

Quality of services and products The Organization diligently protects the quality of its products or services. In order to guarantee it, the company's quality standards and procedures must be known in an obligatory manner, and applied in all business activities and under any circumstances.

URBICSA, is committed to providing and offering the best possible product or service to the companies that demand them, which it achieves by working with the highest quality, knowledge, proactivity and responsibility.

Finally, it is important to keep in mind the responsibility to remain attentive to those situations that could be detrimental to the quality of the products or services, warning of this through the reporting channels established in this code of ethics.

Article 8

Equal opportunities, professional development and non-discrimination:

URBICSA has a strong commitment to the people who are part of it, given that they are the great asset of the company. The Organization strives to create work environments where trust and respect, cordiality and the effort of teamwork prevail. The company expressly prohibits any abuse of authority, as well as any conduct that could generate an intimidating, offensive or hostile work environment.

The Organization shall uphold and promote respect for the principles of equal opportunities and non-discrimination and shall contribute to a diverse and inclusive working environment. Within the company, discrimination based on gender, race, sexual orientation, religious beliefs, political opinions, nationality, social origin, disability or any other circumstance likely to be a source of discrimination will not be admissible.

It should be noted that it is a basic principle of the organization to provide the same opportunities in access to work and in professional promotion, consequently, any type of promotion at work will respond to the principles of merit and ability defined in the requirements of the position. In this way, equal opportunities and the promotion of a corporate culture based on merit are ensured.

Likewise, the intervention of the selection and / or professional promotion processes must be based on their actions and decisions in the strictest criteria of objectivity, with the attitude open to diversity as well as with the aim of identifying those people who best suit the profile and the needs of the position to be filled, promoting equal opportunities at all times, based on their qualification and abilities.

INTERNAL ORGANIZATION RULES

Article 9

Segregation of functions

In order to prevent internal fraud of the organization, URBICSA will apply, as far as possible, a principle of segregation of functions to prevent involuntary errors, internal fraud or embezzlement, preventing the same individual from performing all the tasks of a certain operation. Consequently, the award of functions that correspond to each area or person carried out by URBICSA must be respected.

Article 10

Resources and means for the development of professional activity

URBICSA makes available different resources and means for the development of its professional activity in order to correctly achieve its objectives; they include both physical assets, such as facilities, electronic equipment, machinery, furniture and others, as well as intangible assets, such as confidential information, intellectual property and information systems. All these assets that are the property of the Organization and must be used responsibly, honestly, effectively and always for legitimate commercial purposes. Likewise, the obligation to protect them from any damage or improper use is imposed.

Article 11

Outsourcing.

URBICSA will not subcontract with third parties that do not comply with the provisions of this Code of Ethics. Likewise, they must always respect the rights of workers, the regulations regarding health, safety and hygiene at work, as well as those related to the Prevention of Occupational Risks. By virtue of the above, it will not be contracted with companies that maintain labour relations that do not adapt to the labour provisions in force.

Article 12

Anti-bribery and anti-corruption

No one in the company, whether directly or indirectly, should ever offer or promote an improper personal or financial favour or other type of favour in order to obtain or obtain a business or other advantage from a third party, whether it has a public or private character URBICSA prohibits administrators, managers, partners and employees receive any type of remuneration, gratification, financing, benefit or advantage for services of their activity, by interposed person. Likewise, the directors, directors, partners and employees are not authorized to accept any offer, benefit or advantage in favour of URBICSA, and to the detriment of third parties. In the same way, administrators, managers, partners and employees are also prohibited from accepting gifts, invitations, favours or any other compensation from suppliers, third parties or internal. This is without prejudice to courtesy attentions of symbolic value, which will be all those that do not

No one in the company, whether directly or indirectly, must ever offer or promote an undue personal or financial favour or other type of favour in order to obtain or obtain a business or other advantage from a third party, whether it is public or private URBICSA prohibits administrators, managers, partners and employees from receiving any type of remuneration, gratification, financing, benefit or advantage for services of its activity, by interposed person. Likewise, the directors, directors, partners and employees are not authorized to accept any offer, benefit or advantage in favour of URBICSA, and to the detriment of third parties. In the same way, administrators, managers, partners and employees are also prohibited from accepting gifts, invitations, favours or any other compensation from suppliers, third parties or internal. This is without prejudice to courtesy attentions of symbolic value, which will be all those that do not exceed the value of 150 euros and provided that it meets the requirements specified in Art. 22 (relationship with suppliers).

No administrator, director, partner or employee is authorized to deliver gifts, commissions or remuneration of any nature, especially when the recipient is an authority, body, political party, institutions in general or public administrations. This prohibition extends to any contribution in favour of the same that is intended to be made at the expense of URBICSA.

All persons linked to the Organization must provide correct and truthful data in the procedure for obtaining subsidies, allowances and aid for the benefit of URBICSA. In the same sense, when an official or public authority carries out an action in which he incurs the will of deception or guilt, everyone in URBICSA, has the obligation to reject his claims. In addition, you must communicate this situation through the channel enabled for this purpose.

Article 13

Gifts and invitations:

The people who are part of the URBICSA workforce must be diligent about complying with the laws and regulations against corruption and bribery, in URBICSA we will provide the services with honesty, impartiality and professionalism. Therefore, actions such as giving or receiving gifts, gifts or invitations to recreational activities in excessive or inadequate amounts can serve to exercise inadequate as well as constitute bribes or appear to be bribes.

That is why the request and acceptance, either directly or indirectly, of any type of payment, gifts, favours or any type of compensation in relation to the professional activity that comes from customers, intermediaries, suppliers or third parties that may influence commercial decision-making unduly or to gain an unfair advantage is prohibited.

Excluded from this prohibition are invitations, objects of propaganda, attentions, occasions or common courtesies that are not in cash and that are within reasonable limits.

Likewise, the members of URBICSA can accept gifts, favours and leisure activities only if they meet the following requirements

- If they do not contravene the law.
- Whether they are consistent with the usual business practices of the country or industry.
- If they have a reasonable relationship with business relationships.

- Whether consistent with existing business guidelines.
- Si no pueden ser interpretados como soborno o influencia indebida.
- If they do not infringe the values or business ethics of URBICSA, in any other way.
- If they have a value of less than € 150.

In case of any doubt in this regard, the Legal Compliance Committee will be consulted, who may authorize the receipt or realization of gifts.

Article 14

Prevention of conflicts of interest in the business field:

Whoever is part of the Organization must avoid situations that involve a conflict of their personal interests or of a person linked to those of the Organization, always acting, in the fulfilment of their responsibilities, loyalty and in defence of the interests of the organization.

A person related to the spouse or analogue of the worker, the ascendants, descendants or siblings of the workers or spouse and the spouses of the ascendants, descendants or siblings of the workers or spouse shall be considered a person.

No one in URBICSA can use their position in the Organization to obtain advantages or business opportunities for their own benefit or that of a related person, or provide services to competing companies.

The Organization believes that the relationship with individuals should be based on loyalty arising from common interests. Participation in other financial or business activities will be respected as long as they are legal and do not collide with your responsibilities in URBICSA.

The Legal Compliance Committee must be informed of your external activities or relationships that may present a potential conflict of interest or the appearance of a conflict. Likewise, they must comply with the law and policies of this company..

To avoid conflicts or misunderstandings, the Legal Compliance Committee should be informed of external activities or relationships that may present a possible conflict of interest or the appearance of a conflict. Likewise, they must comply with the law and policies of this company.

In case of any conflict, it will be resolved by the management of the affected area. In the event that the conflict transcends by different areas, it will be resolved by the person who occupies a hierarchically superior position of all of them. In the event that this figure is not within the Organization, the conflict will be resolved by the Legal Compliance Committee.

Article 15

Financial records:

URBICSA assumes the principle of information transparency, which translates into the transmission of reliable information in the markets. Therefore, the economic-financial information of the Organization must reflect the economic, financial and patrimonial business reality in accordance with generally accepted accounting principles.

Accounting shall always be carried out in a particularly diligent manner. The preparation of the accounts will be carried out in such a way that it reflects the faithful image of the assets and the financial situation of URBICSA, as established by commercial regulations.

Strictly comply with the duty of conservation and custody of all documentation used in the exercise of his professional activity, which derives from the confidential nature of all accounting documents.

Article 16

Computer security, confidentiality of information and data protection:

The persons who are part of the Organization must strictly comply with the provisions of this Code of Ethics in relation to the use of information and communications systems. Likewise, regarding the confidentiality of information, URBICSA postulates that this principle and the diligence in the use of the Organization's data preside over the actions of the recipients of this Code. This principle must be respected even when the relationship with the Organization has been terminated regarding the preservation and disposal of documents and records, the Organization complies with the strictest legal and regulatory requirements.

All records and information shall be treated in a manner that ensures that the archiving, storage and retrieval of recorded information is always carried out in an organized and secure manner. Likewise, the disposal of documents, whether in paper or electronic format, must be carried out in an appropriate, timely manner and, above all, ensure that they cannot be recovered.

The information of the Organization may not be used for private benefit, nor communicated to third parties. Among the information that we consider confidential, we highlight professional secrets, pricing regulations, strategic or business operational plans, data related to new products, contracts, agreements, lists of employees, customers, suppliers, software or computer programs, information on HR, personnel plans, internal communications, subscription lists and, in general, data affected by data protection regulations. In relation to the data obtained, the maximum respect for the personal and family privacy of the persons in question is required.

Article 17

Prevention of money laundering and terrorist financing.

We can understand as Money Laundering the following activities:

- a) The conversion or transfer of property, knowing that these assets derive from criminal activity or their participation, for the purpose of concealing or concealing the illicit origin of the property or of helping the person involved to avoid the legal consequences of their acts
- b) Concealment or concealment of the nature, origin, location, disposition, movement or actual ownership of property or rights in property, knowing that such property derives from criminal activity or participation in criminal activity.

c) The acquisition, possession or use of property, with knowledge that at the time of receipt of the same come from a criminal activity or from their participation in one of them.

d) Participation in any of the activities mentioned in the previous letters, the association to commit this type of acts, the attempts to perpetrate them and the fact of helping, instigating or advising someone to carry them out or facilitate their execution.

The objective of these activities is to make the funds or assets obtained through illicit activities appear as the fruit of legitimate activities and circulate without any restriction in the financial system and business activities, allowing the administration of the same.

In order to prevent the commission of any of the activities mentioned above, through this Code we guarantee that URBICSA complies with current regulations on the Prevention of Money Laundering and Financing of Terrorism.

In relation to this matter, when cash payments must be made, the provisions of the internal procedures established in URBICSA will be followed, and an attempt will be made in some other alternative way to the cash payment. In the event that it is impossible to make the payment by another means, the necessary authorization of the competent person must be obtained. Such payments may never exceed the amount of 2,500 euros.

Article 18

Environmental protection

The Organization is committed to ensuring respect for the environment, to minimize the environmental impact in all its activities and to disseminate the culture of respect for the environment as a principle of conduct in its actions.

Everyone who has an employment relationship with URBICSA, must know and assume this policy and act at all times in accordance with the criteria of respect and sustainability, and adopt habits and behaviours of good environmental practices and contribute positively to the achievement of the established objectives as well as strive to minimize the environmental impact derived from their activities and the use of facilities, equipment and means of work made available to you

As for relations with contractors or external collaborating companies, these values will be transmitted within your relationship.

Specifically, some of the measures to be adopted in order to comply with this standard are the following:

- Adopt measures in order to prevent pollution or minimize its emissions.
- Apply measures to ensure compliance with environmental regulations applicable to our activities at the local, national and global level in which the Organization operates.
- Establish procedures for the periodic review of compliance with the environmental policy as well as apply corrective measures when these have been breached.
- Train and raise awareness among workers so that in their day to day work they perform their functions following the environmental policy.

Disseminate environmental policy among URBICSA, suppliers and other parties.

- Systematically reduce waste, recycling and reusing whenever possible.
- Efficiently use natural resources, raw materials and energy.

Article 19

Donations and sponsorship or sponsorship activities:

A voluntary contribution made by any natural or legal person, without consideration, for a specific reason will be considered a donation. Regarding them, URBICSA will not admit the realization of any type of donation of any nature that has not been previously authorized by its Board of Directors.

Sponsorship or sponsorship activity will be considered those economic contributions made by the company with the aim of supporting groups or organizations related to sport, culture, economy, religion, science, society, and environment or similar that are carried out by marketing and public communication activities.

Thus, sponsorship and sponsorship activities in cash will be allowed as long as they do not exceed THREE THOUSAND EUROS (€ 3,000). Any sponsorship or sponsorship activity that exceeds this threshold must be previously authorized by the Board of Directors.

RULES RELATED TO THE WORKING ENVIRONMENT

Article 20

Reconciliation of family life with work activity The Spanish legal system promotes the reconciliation of family and work life. Then, in order to adapt to current regulations, URBICSA contracts with the people who are part of the workforce the commitment to promote the improvement of their quality of life and that of their families, such as, for example, responsible time flexibility at the time of entry and exit, making the enjoyment of leave for family reasons more flexible or making the enjoyment of paid leave for births more flexible, illness, hospitalization, or death. This commitment is reached by promoting measures aimed at reconciling the requirements of work with the needs of your personal and family life.

Article 21

Health, hygiene and safety at work

URBICSA is committed to the protection of occupational health and safety, visitors, customers and subcontracted companies. In this way, it assumes responsibility for the safety and health of the people who work in the company's facilities and buildings, guaranteeing labour and health protection within the framework of current national provisions, as well as based on the labour and health protection policy of the entire Organization.

To achieve this purpose, URBICSA will implement internal training processes in the field of occupational risk prevention, the technical equipment necessary for the fulfilment of its functions will be provided, and a record will be kept internally accrediting the training provided. Employees undertake to carry out any training activity that is scheduled to improve their ability to perform work tasks safely and to make responsible use of the materials and equipment of the Organization. At the same time, they must contribute to taking care of their health and must comply with the requirements of labour and health protection.

Likewise, the Organization will require subcontracted companies, suppliers and third parties with which it collaborates to comply with the regulations on occupational risk prevention.

Anyone who considers that the task entrusted is unsafe or is not within your reach or if they suspect that any part of the facilities or equipment is not working properly and may not be safe.

The possession, consumption, purchase, sale, attempted sale, distribution or manufacture of illegal drugs in the workplace, as well as the consumption of alcohol, illegal drugs and misuse of prescription drugs while carrying out work-related activities, is strictly prohibited. It is also totally forbidden to conceal accidents at work or very serious incidents, falsify safety records or order breaches of safety regulations. Failure to comply with or ignore this regulation entails particularly serious disciplinary measures.

NORMS RELATED TO THE MARKET

Article 22

Customer Relations

Ethics and respect will preside over business relations, which will be selected according to objective and transparent criteria. In this case, respect for the Code of Ethics will be part of a supply or service provision contract and its breach may result in the possibility of renouncing the contract.

For this purpose, the Code of Ethics may be given as an annex to the contract. Internal procurement procedures will be scrupulously respected, justifying decisions and preserving related documentation for possible internal or external control.

REPORTS OF VIOLATIONS, SUSPECTED INFRINGEMENT, OR ILLEGAL OR UNETHICAL CONDUCT

If you suspect that any person subject to this Code of Ethics has breached it or has incurred or may incur, in illegal or unethical conduct, you should immediately contact the Legal Compliance Committee and be able to contact the email enabled (canal.etic@urbicsa.es).

Violations of this Code of Ethics may constitute an internal infraction as well as an infraction of the law and entail the appropriate sanctions.

URBICSA will adopt the necessary measures to protect the confidentiality of any complaint made, without prejudice to the applicable legal provisions. The Organization will not allow or tolerate reprisals of any kind, exercised directly or indirectly by URBICSA or its staff against workers who notify or report in good faith any possible violation of this Code or any illegal or unethical conduct.

APPROVAL, DISSEMINATION, COMPLIMENT AND UPDATING OF THE CODE.

The Board of Directors of URBICSA will be responsible for approving this Code of Ethics and the Legal Compliance Committee will be responsible for ensuring the dissemination of the Code among all its recipients so that they know its content and understand its scope.

The Legal Compliance Committee of URBICSA will try to keep the directors, partners and employees of the Organization informed about the content of this Code of Ethics and about the prevention systems and risk behaviours. In the same way, they have the duty to comply with the principles, value and guidelines contained in this Code, as well as to ensure their correct compliance. Finally, it should be noted that they also have the duty to report to the Legal Compliance Committee any irregularity of which they may be aware.

The Legal Compliance Committee will ensure that periodic reviews are carried out in order to keep the Code of Ethics and the business procedures that arise for its compliance updated. It may be advised whenever it deems appropriate from external advisors in the matter. It will be the Board of Directors of URBICSA that must approve the modifications made.

Communication

This Code of Ethics will be available through a link to the corporate website of URBICSA, so that both employees and third parties who have a relationship with the Organization, or without having, can know the interest of URBICSA, to prevent the commission of crimes as well as to be informed about the principles and values that guide the professional activity of the Organization and, communicate, if applicable, the possible commission of crimes or conduct contrary to the regulations in force within the Organization.

The updated Code of Ethics will be provided to all staff by the means deemed most appropriate. It should be noted that all workers must record their receipt.

As for the new workers, they will be provided with a copy of the URBICSA Code of Ethics together with the employment contract, and the corresponding document must be signed in which it is stated that the new worker is aware of and understands its content and, in this way, their obligation to comply with it is also reflected..

Finally, all workers must confirm, once they have received the appropriate training, their full knowledge and conformity, committing themselves to comply with the principles, rules and procedures contained in the Code of Ethics during the performance of their professional activity.