

CODE OF BUSINESS CONDUCT. **(INTOLERANCE TO BRIBERY AND THE CORRUPCION)**

1. OUR COMMITMENT

We believe in win business on the merits of our products, services and technologies.

We know that corruption is essentially incorrect and obstructs the sustainable development, harms society and has a greater negative impact on communities in developing countries.

We will not pay bribes or give something of value that may influence or appear to influence the criteria or the actions of others. Never ignore the suspicion of bribery or corrupt behaviour.

We comply with the laws on anti-corruption and anti-bribery in any place where we do business.

Regardless of what the law allows local, we prohibit make facilitating payments or offer, payment, promise to pay or accept anything of value, either directly or indirectly, to:

- To obtain or retain business.
- Influence business decisions.
- Accelerate a process of government.
- Gain an unfair advantage.

All directors, officers and employees, as well as third parties acting on our behalf, must share and fulfil this commitment.

2. THEIR RESPONSIBILITIES

- Complies with the law.
- Know, understand and comply with our Code and the law governing the work you do.
- Do not give bribes or facilitating payments** nor allow others to do so on our behalf.
- Avoid even the appearance of something inappropriate, regardless of the local practice or the practice of other companies.

**a facilitating payment is a small payment (sometimes referred to as an "incentive") of cash or anything of value. For example: a government official to expedite or ensure the execution of a routine governmental action. DEIDE prohibits all forms of facilitating payments.

3. PATTERNS OF BEHAVIOUR

- Know a bribe when I see it.

Recognize that a bribe can take many forms, such as payments, favours, charitable or political contributions, sponsorships, gifts, meals, entertainment or travel, and comply with our code.

Appearances do matter. Even if your intent is honourable, if other suspect otherwise, don't do it. Follow our Code and ensure that their conduct is beyond reproach.

- Minimize the risks posed by third parties.

In addition to our own actions, we are responsible for the actions of third parties if they make corrupt payments on our behalf; therefore, be sure to identify those third parties, which would fall within the definition of "intermediaries" of the company and follow the required process of approval and due diligence of pre-selection.

Once hired, monitor their performance and report if an intermediary behaves in a way that could be inappropriate. Never hire a third party to do anything that you can't do or allow him to do it.

4. WE AVOID CONFLICTS OF INTEREST

OUR COMMITMENT

- We believe in keeping our personal interests separate from the interests of DEIDE.
- Avoid personal relationships and activities that may interfere-or even appear to interfere - with our objective decision-making as an employee of DEIDE.

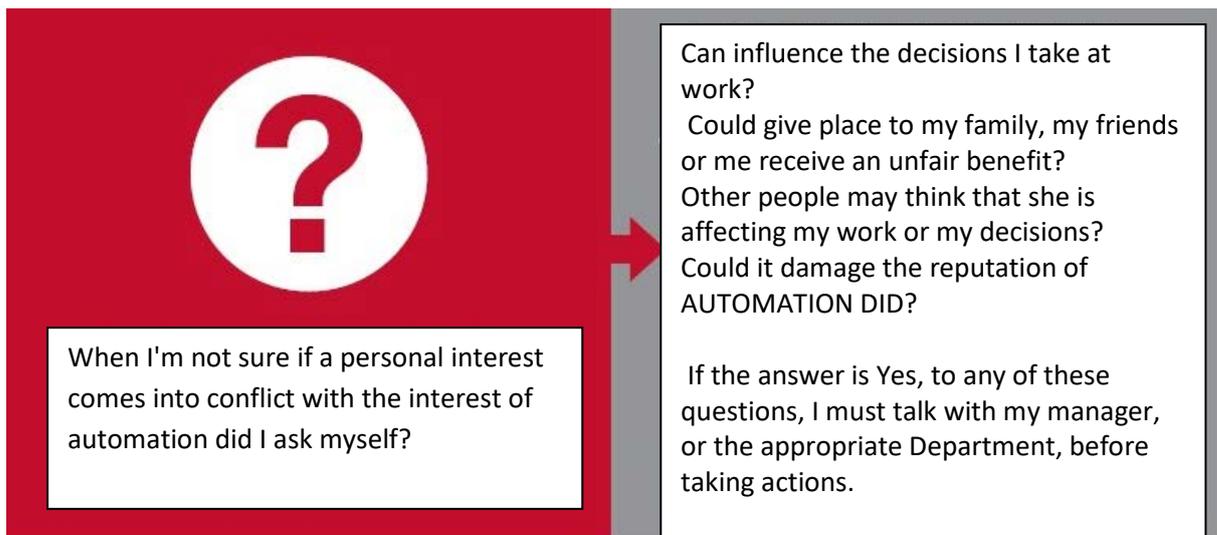
THEIR RESPONSIBILITIES

- Identify a conflict when you see it.

The capacity to recognize the kinds of personal situations that may confuse his professional judgment. Even when it is not possible to mention every possible conflict you might face, conflicts arise, as for example when in some situations:

- Reversed (or ask a family member or friends to invest in a company or a company with which we do business.
- Hires, supervises or conducts business of the company with family or friends.

- Performs other work, out of DEIDE, which competes with the work you do for us or interferes with the time, talent, and energy that you use in your work.
- Served on boards of companies that have the same commercial interests us.
- Receive gifts or entertainment from suppliers that do not comply with our policies.
- For personal gain:
 - Take advantage of business opportunities that belong to DEIDE.
 - Receives personal benefits from a provider of DEIDE
- Be sure to take decisions in an objective way.
 - Never use DEIDE in their work or their access to resources of DEIDE to personally benefit or benefit to your family or your friends. Make sure you have the appropriate authority when making decisions.
 - Spend DEIDE resources with the same care they would spend their own resources.
- Reveals the existence of conflicts of interest.
 - If you are aware of a conflict or the appearance of a conflict or if you suspect the existence of a conflict, report immediately to your manager, and the Compliance Department.



When I'm not sure if a personal interest comes into conflict with the interest of automation did I ask myself?

Can influence the decisions I take at work?
Could give place to my family, my friends or me receive an unfair benefit?
Other people may think that she is affecting my work or my decisions?
Could it damage the reputation of AUTOMATION DID?

If the answer is Yes, to any of these questions, I must talk with my manager, or the appropriate Department, before taking actions.

5. POLICY ON THE RULES ON GIFTS, ENTERTAINMENT AND TRAVEL

OUR COMMITMENT

- We believe in establishing good working relationships, but we are required to comply with our code and use good judgment, discretion and moderation when we give or receive gifts or entertainment.
- Our Code helps us to distinguish between the offers that are within the limits of good business practices and those that might compromise or seem to compromise our professional judgment.
- The gifts in cash or the equivalent of cash gifts are never appropriate and are strictly prohibited.
- Gifts or entertainments that create a feeling or an appearance of obligation, are requested or excessive or can embarrass DEIDE are also not appropriate.
- cannot offer gifts or entertainment - even if in other circumstances were in agreement with good business practices- during an active invitation to someone with authority for the award of the tender.
- DEIDE sponsored trips must be made in order to market our goods and services, certifying our manufacturing capacity or for similar purposes.
- As in the case of the gifts and entertainment, travel should be appropriate and reasonable, approved and registered in accurate and complete information on our books and records.
- It is never appropriate to provide travel for a longer period than is necessary in order to comply with a commercial purpose or provide secondary or complementary trips that aren't strictly related to a commercial purpose.

THEIR RESPONSIBILITIES

- **What you should do**

Make sure that any gift, entertainment or travel offered by DEIDE to a third party, or any gift or entertainment offered to user's manual for a third party:

- Appropriate and reasonable, that is to say that the gift or entertainment to serve a legitimate business purpose of DEIDE DEIDE and promote.
- Complies with the law and the policies of the company of the party that provides, and of the party, which receives it.

- Conforms to the generally accepted local business practices and an objective observer would consider it appropriate. It's provided in an open and transparent manner.
- Obtain management approval and Compliance Department before accepting offers of travel paid by third parties.
- **What not to do**
 - Offering, giving or accepting a gift or entertainment if you:
 - It is in cash or cash equivalent (e.g., gift cards, gift certificates, loans or shares and bonds).
 - Gives the appearance that it is offering to get something in return, as a benefit or a favourable business decision.
 - Is offered to someone during a bidding process.
 - May DEIDE to shame.
 - It is requested.
 - Is excessive or might seem excessive to other people.
 - Involves a family member of a third party.
 - Offer travel and reimbursement of costs related if:
 - Involves a family member of a third party.
 - It is secondary or complementary travel to other cities or countries.
 - Seeking to influence inappropriately in a commercial decision.
 - Create an appearance of obligation.
 - Is excessive or might seem excessive to other people.
 - The Department of compliance does not grant approval.

6. WE COMPLY WITH INTERNATIONAL TRADE LAWS

OUR COMMITMENT

- Our ability to import and export products, services, software, and technology in the world is a privilege, not a right, so we must comply with the laws and regulations of all the countries where we operate.
- Comply with international trade laws. Royal Decree-Law 7/2021. LO 6/2021. DIRECTIVE (EU) 2018/843 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on competition, prevention of money laundering, credit institutions, telecommunications, taxation measures, prevention and remedying of environmental damage, posting of workers in the provision of transnational services and consumer protection.

THEIR RESPONSIBILITIES

- Stay alert and informed when performing cross-border transactions.
- Get the necessary licenses and permits applicable to imports and exports, including hand baggage, the delivery of messaging and electronic transfers. Make sure that each cross-border transaction includes the classification of import and export, the valuation and the information of the country of origin.
- Know where DEIDE is authorized to operate and it chooses to do so.
- Trade sanctions can forbid us to do business with certain countries, entities and persons or parties restricted.
- Meet their counterparts:
 - Know with whom you are working and be alert in relation to the place where and why it is working.
 - Get Statements of end user/end use/final destination of the clients to ensure that our goods and services go to the correct recipient at the correct destination through the correct path to be used in the right way.
 - Use only customs brokers and freight forwarders approved. These are high-risk intermediaries, so you should ensure that these suppliers comply with our due diligence requirements and be approved before using their services.
- Reject boycotts prohibited:
 - Review all documents that are submitted by third parties to DEIDE for approval; make sure that boycott requests are reported to the Office of Compliance and wait for instructions.
 - The boycotts DEIDE restrictions in the conduct of business with certain countries and parties.

Extreme the vigilance.

- This alert to any warning sign in cross-border transactions that could put DEIDE in a situation of risk, especially in relation to sanctioned countries or restricted portions.
- Immediately raise any concern the Compliance Department.

- Ask questions:

- You don't sure, where it is forbidden that DEIDE does business with or has decided not to do business today. Ask the Department of Management.

Moncada at, 13/05/2016



José Antonio López Reyes.
Manager.
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