



CODE OF ETHICS FOR SUPPLIERS

Drafted by		Approved by		Version	
Responsible body	Date	Responsible body	Date	Version	Date
Compliance Committee	11/11/2020	Governing body	29/04/2021	1	29/04/2021

Control of changes

Version	Date	Author	Summary of changes
1	11/11/2020	Compliance Committee	Version 1

Table of contents

1.	INTRODUCTION	3
2.	SCOPE OF APPLICATION	3
3.	ETHICAL COMMITMENTS FOR SUPPLIERS.....	3
4.	REGULATORY AND CONTRACTUAL COMPLIANCE.....	4
5.	PREVENTION OF CORRUPTION	4
6.	SUPPLIERS' CONFLICTS OF INTEREST	5
7.	SUPPLIERS' DUTY OF SECRECY.....	5
8.	SUPPLIERS' WORK PRACTICES	5
9.	SUPPLIERS' HEALTH AND SAFETY COMMITMENTS.....	6
10.	SUPPLIERS' ENVIRONMENTAL COMMITMENTS.....	6
11.	QUALITY AND SAFETY OF THE PRODUCTS AND SERVICES SUPPLIED.....	7
12.	COMMUNICATION	7
	ANNEX 1: REFERENCE STANDARDS.....	8

1. INTRODUCTION

WORLDSSENSING, S.L. (hereinafter, WORLDSSENSING) aspires to ensure that both its conduct and that of its related parties complies with and conforms to the principles and values of business ethics and transparency in all its action areas, and especially to the content of its Code of Ethics, in addition to meeting the prevailing legislation and its corporate governance system.

This Code of Ethics will serve as a guide for the company's suppliers on how to act in a global, complex and changing context.

This Code of Ethics takes into account the generally accepted good governance recommendations on international markets and the principles already defined in WORLDSSENSING'S general Code of Ethics. It also meets the prevention obligations imposed in the area of criminal liability for legal persons, which are delimited in the company's Criminal Compliance Policy and the other internal regulations implementing it.

This Code of Ethics forms part of the corporate governance system and fully respects the corporate organisation principles set out therein. WORLDSSENSING has a clear culture of regulatory compliance and devotes efforts and resources to improving its prevention, compliance and quality standards. Therefore, it believes that a fundamental piece for such purpose and objective is that the suppliers with which it works must have similar standards.

2. SCOPE OF APPLICATION

The principles and standards of conduct contained in this Code of Ethics are applicable to all WORLDSSENSING'S suppliers, regardless of their geographical location and the products or services that they supply or provide.

This Code contains the ethical principles that must govern the actions carried out by WORLDSSENSING'S suppliers and which must be expressly accepted by them before starting its contractual relationship with those companies.

When WORLDSSENSING signs written agreements with its suppliers, it shall include a clause in them whereby the suppliers accept and are subject to this Code of Ethics for Suppliers and attach the latter to those contracts as a schedule. They shall also receive WORLDSSENSING'S Code of Ethics.

This Code of Ethics for Suppliers is understood without prejudice to the additional conditions and requirements that may be set out in the applicable legislation, in the practices and regulations of the various jurisdictions in which WORLDSSENSING carries out its activities and in the various contracts that may be formalised with each supplier.

3. ETHICAL COMMITMENTS FOR SUPPLIERS

The suppliers must build their business relationships based on the principles of transparent business ethics and management.

The suppliers must know and respect the principles and values contained in WORLDSENSING'S Code of Ethics, the prevailing version of which will always be published on www.worldsensing.com. Those principles and values must especially take into account:

- (i) regulatory and contractual compliance;
- (ii) diligence, loyalty, professionalism and integrity;
- (iii) respect for people's fundamental rights and freedoms;
- (iv) avoidance of conflicts of interest;
- (v) prevention of corruption and money laundering;
- (vi) respect for workers' rights and equal treatment without any type of discrimination, fostering equal opportunities;
- (vii) environmental protection;
- (viii) respect for privacy and the right to privacy.

4. REGULATORY AND CONTRACTUAL COMPLIANCE

WORLDSENSING'S suppliers must always comply with the applicable regulations in Spain and abroad in all fields of activity.

WORLDSENSING'S suppliers must always comply with all the contractual obligations and conditions that they undertake.

WORLDSENSING'S suppliers must always act responsibly and diligently.

5. PREVENTION OF CORRUPTION

The suppliers must always comply with WORLDSENSING'S policies on preventing corruption, bribery and extortion, and with the strictest codes of ethical and moral conduct, the domestic legislation and the international treaties, always respecting the applicable prevailing regulations and making sure that they establish the appropriate procedures required for such purpose.

The suppliers cannot directly or indirectly promise, offer nor pay any bribes to facilitate transactions or other undue payments to third parties or company professionals in relation to their contracts with the company.

The suppliers cannot directly or indirectly promise, offer nor pay any money or other valuable goods to:

- (i) influence an act or decision of a third party or WORLDSENSING professional;
- (ii) obtain undue advantage for WORLDSENSING; or
- (iii) induce a third party or a WORLDSENSING professional to exercise influence over the act or decision of a civil servant.

Specifically, the suppliers cannot promise, offer nor deliver gifts or valuable objects of any type to persons or entities which are civil servants or employees of the Public Administrations as a result of or related to the formalisation of their contracts with the company.

The suppliers can only promise, offer or provide gifts or objects with reasonable prices, including entertainment or meals as a result of or related to the formalisation of a contract, to persons or entities which are not civil servants nor employees of the Public Administrations and in accordance with all the anti-corruption laws and the corporate governance system's integrity and ethics policies.

In any case, the token gifts or objects must meet a legitimate commercial purpose and be in line with the protocol on accepting and giving gifts approved by the company's governing body.

When suppliers are aware of an improper, unlawful or illegal conduct from a WORLDSENSING employee, they must notify the company.

6. SUPPLIERS' CONFLICTS OF INTEREST

The suppliers must have mechanisms which guarantee that, in the event of a conflict between the supplier's interest and the personal interest of any of its employees, the supplier's independence of action and the fact that it is fully subject to the applicable legislation shall not be affected.

7. SUPPLIERS' DUTY OF SECRECY

WORLDSENSING'S suppliers are aware that WORLDSENSING is an innovative technological company with extensive know-how. If secret and confidential know-how is revealed without authorisation, this may cause serious economic, strategic and reputational damage to the company.

The information owned by WORLDSENSING that is entrusted to suppliers shall be generally considered as reserved, confidential and secret information.

The suppliers and their respective professionals and employees are responsible for adopting adequate security measures to protect the reserved, confidential and secret information.

The suppliers must have, with their employees and any non-employee collaborators who access WORLDSENSING'S information, written non-disclosure agreements to guarantee their commitments with WORLDSENSING.

The information provided by the suppliers to their liaisons at WORLDSENSING must be truthful and comprehensive and not intended to mislead.

8. SUPPLIERS' WORK PRACTICES

The suppliers must foster actions and adopt the necessary measures at their organisation to eliminate all forms or types of forced or compulsory labour, understood as all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.

The suppliers must expressly reject the use of child labour in their organisation, respecting the minimum hiring age in accordance with the applicable legislation, and have the appropriate and reliable mechanisms to verify their employees' age.

The suppliers must respect the workers' freedom of association and right to collective bargaining, subject to the applicable regulations in each case.

The suppliers must reject all discrimination in employment and occupation, treating their staff fairly and with dignity and respect. Discrimination is defined as any distinction, exclusion or preference made on the basis of race, colour, sex, religion, political opinion, national extraction or social origin, which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation. The suppliers must comply with the applicable equality regulations.

The suppliers must assess the implementation of work-life balance measures to better respect the employees' personal and family life, and must provide the best balance between the employees' personal and family life and the job responsibilities of women and men, based on the applicable laws and best practices.

The suppliers must pay their workers in accordance with the applicable salary laws, including the minimum wage, overtime and company benefits.

9. SUPPLIERS' HEALTH AND SAFETY COMMITMENTS

The suppliers must ensure protection of their workers, avoiding their overexposure to chemical, biological, physical and task hazards which require physical overexertion in the workplace.

The suppliers must identify and assess the potential emergency situations in the workplace and minimise their potential impact by implementing emergency response plans and procedures.

The suppliers must provide their staff with the necessary training and means so that they can carry out their work as per contract. The suppliers must be liable for any loss or damage caused to their staff where the liability is attributable to the suppliers as a result of an action or omission, especially because they have not adopted the corresponding preventive measures to avoid them.

10. SUPPLIERS' ENVIRONMENTAL COMMITMENTS

The suppliers must rigorously comply with the applicable environmental regulations and have an effective environmental policy or appropriate equivalent measures, based on the products supplied and services provided.

The suppliers must identify and manage the substances and other materials which are hazardous when released into the environment with the aim of guaranteeing their manipulation, transfer, storage, recycling or reuse and elimination under safety conditions and complying with the applicable regulations.

The suppliers must know and continuously assess the environmental risks of the production facilities and constantly improve and update the mechanisms designed to mitigate them.

If those risks materialise, the suppliers must lessen the impact, including, when appropriate, granting financial guarantees.

The suppliers must contribute, within their scope and possibilities, to helping WORLDSENSING improve, innovate and develop environmental measures that lead to environmental improvements in WORLDSENSING'S products.

11. QUALITY AND SAFETY OF THE PRODUCTS AND SERVICES SUPPLIED

All the products and services provided by the suppliers must comply with the quality and safety standards and parameters required by the applicable laws and by WORLDSENSING when arranging them. WORLDSENSING shall not be liable for the damage caused by defective products or services.

12. COMMUNICATION

If there are other types of conduct that the suppliers must comply with other than those detailed in this Code and in WORLDSENSING'S Code of Ethics, the company will send specific indications to the suppliers by email and in accordance with the ISO 27001 and ISO 9001 standards.

The suppliers can formalise any allegations related to the principles and values of this Code of Ethics by writing to compliance@worldsensing.com.

The allegations received shall be processed by WORLDSENSING'S Compliance Committee, which is an independent body.

WORLDSENSING encourages its suppliers to have an ethical channel so that their staff can submit allegations and/or complaints without fear of retaliation.

ANNEX 1: REFERENCE STANDARDS

- **Universal Declaration of Human Rights:** adopted by the United Nations General Assembly in Resolution 217 A (iii) on 10 December 1948.
- **Convention on the Rights of the Child:** approved as an international treaty on human rights on 20 November 1989 and entered into force on 2 September 1990.
- **Global Compact Principles:** a UN initiative created in 2001 for responsible corporate behaviour. It contains 10 principles in four large blocks: (i) labour, (ii) human rights (iii) environment and (iv) anti-corruption.
- **Sustainable Development Goals (SDGs):** after the agreement reached by the UN member states on 25 September 2015, 17 Sustainable Development Goals and 169 targets were defined with the aim of meeting three major challenges in the coming 15 years: (i) eradicate extreme poverty, (ii) combat inequality and injustice, and (iii) tackle climate change.
- **National Action Plan on Business and Human Rights:** on 28 July 2017, the Spanish Cabinet approved a National Action Plan to apply the UN Guiding Principles on Business and Human Rights.
- **Modern Slavery Act 2015:** on 26 March 2015, the UK enacted the Act on slavery, servitude and forced or compulsory labour and human trafficking, making it a global benchmark.
- **ISO 20400:** the first international standard on sustainable procurement.
- **ISO 19600 and UNE 19601:** the first international and domestic standards, respectively, on criminal compliance management systems.
- **ISO 27001:** an international standard on the security, confidentiality and integrity of data and information, and the systems processing them.
- **ISO 9001:** an international standard on quality management systems.
- **ISO 27701:** an international standard on privacy information management systems.
- **REGULATION (EU) 2016/679** of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).