



# COMPLIANCE POLICY AND CODE OF ETHICS

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**Project:** Integrated Management System (IMS)

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# 1. Compliance Policy v2.0

The Criminal Compliance Policy is NWorld's internal document that reaffirms the entity's commitment to regulatory compliance.

Some of the objectives pursued by this Management System are:

- Permanently increase the competence of the organization.
- Have strategic alliances with the best suppliers.
- Plan excellence in the execution of our projects.
- Ensure regulatory compliance and the fight against corruption.
- To have human teams committed to the future of the business and proud to feel members of NWorld.

NWorld, with the intention of fulfilling these objectives, voluntarily assumes the following commitments:

- Pursue a management aimed at achieving the satisfaction of our customers, within the framework of the applicable legal and regulatory requirements.
- Establish zero tolerance with the commission of crimes and acts of corruption, as well as in the commitment of the entire Organization in compliance with the applicable regulations, promoted and supported by the Management, in the continuous improvement of the Management System, establishing mechanisms of supervision, review and updating.
- Identify in the Crime Prevention Program, all activities in the scope of which the crimes that must be prevented can be committed.
- Establish compliance objectives aligned with the purposes of the organization and make the necessary resources available.
- Appoint an Integrated Management System Committee, which is responsible for carrying out the control and monitoring of the implementation and execution of the Criminal Compliance Management System. This body enjoys total authority, independence and autonomy when carrying out its functions, reporting directly to the Board of Directors.
- Inform staff about the obligation to act in accordance with the Code of Ethics and the Compliance Policy, as well as to report any deficiencies, irregularities, non-compliance or improvement of the System through the Ethical Channel. The channel is completely confidential, and it is guaranteed that there will be no retaliation against those who make communications in good faith.
- Approve an Internal Conduct Regulation that allows penalizing people who act contrary to the law, or the commitments adopted.

The General Management of NWorld, therefore, with the above, is committed to the allocation of reasonable and proportionate human and material resources for the achievement of the above objectives.

The responsibility for the proper functioning of the Compliance System lies with the General Management, delegating to the Integrated Management System Committee the authority and the necessary competences for its effective implementation, accreditation, maintenance and improvement, counting, for this, with the support of the management team and the staff and collaborators of NWorld.

## 2. Code of Ethics v4.2

### Introduction

The Code of Ethical Conduct (hereinafter, the Code) is our guide to appropriate conduct, together with the established work rules and procedures, to ensure that the correct is correct and that as a logical consequence there is no irregularity or non-compliance in the company that could lead to the commission of crimes.

The Code is a guide for all employees, collaborators and suppliers of N-World S.L. and its subsidiaries and affiliates (hereinafter referred to as NWorld) in their professional performance in relation to their day-to-day work, the resources used and the business environment in which they operate. The Code offers guidelines that clarify the basic principles of all management and interpersonal relationships with colleagues, collaborators, suppliers, customers, shareholders and, in general, any person with a direct or indirect interest in the company's activity. Our actions are based on respect for our corporate values, and the employees will adapt our actions to principles of behaviour that are respectful of business ethics and professionalism, with the aim of making it a benchmark in these terms and thus being recognized.

### Scope of application

This Code is addressed to all employees, suppliers and collaborators of NWorld, regardless of the type of contract that determines their employment relationship, the position they hold or the place where they carry out their work.

The persons described above shall have the duty to know, comply with and collaborate in the application of this Code.

At the request of the Compliance Department, these persons and/or suppliers may be required to formally confirm their adherence to the commitments set forth in this Code.

### Values and Principles

Our values represent our identity as a collective. We are different, because NWorld members make this company a unique and differentiating project. We are fast, we know how to listen, we seek innovation, we are helpful, and we work as a team in a rigorous and transparent way.

We make quick decisions and act quickly and dynamically.

The ethical principles that govern this society and that NWorld pursues are based on:

#### **Quality:**

We listen carefully to our customers in order to know exactly their needs and expectations and propose appropriate solutions. We actively look for opportunities to improve services and create new business opportunities. We know the needs and expectations of our customers in order to develop and implement solutions that increase their satisfaction.

We adjust at all times our performance to the principles of loyalty and good faith with the company, with superiors, colleagues and collaborators with whom we relate.

The concern to achieve the objectives set must be constant and continuous. We promote optimistic vs. pessimistic attitudes. We subordinate personal goals to general NWorld goals. We ensure that there is no conflict between the two, and we act in a way that prioritises the interests of the company over personal interests or those of third parties.

We orient our efforts towards the same result, taking into account the contribution of each of the members, no matter how small it may seem.

We listen actively, with an open attitude and respect, to the opinion of all parties involved in a situation. We take advantage of opportunities and problems to provide innovative solutions.

We are constantly updating our technological know-how in order to become pioneers in innovation.

We are committed to taking the utmost care to preserve the image and reputation of NWorld in our professional performance, making an adequate and correct use of it and we demand it both from its employees and in the case of our suppliers.

### **Honesty:**

All NWorld employees agree to declare any personal or professional relationship that could create a conflict of interest in the performance of our duties as NWorld employees.

In addition, as employees of NWorld we do not accept undue compensation or advantages. We inculcate honesty and professional ethics in the usual commercial and professional relationships in the performance of our work, both in the private sector and in our relations with Public Administrations. We do not offer gifts, nor do we promise undue favored treatment to third parties, whether public or private, in order to gain an advantage. We promote trust in declaring the gifts or advantages that we may obtain from third parties and make them available to the company. Any personal or professional relationship that affects the interests of NWorld is communicated to the immediate manager.

We avoid conduct that is contrary to free competition, or that involves an act of unfair competition. In advertising campaigns, we provide information in a clear and truthful way.

### **Respect and equality:**

We respect equality, dignity and privacy, avoiding any conduct that intimidates or offends people's fundamental rights.

Each and every one of us is responsible for generating an atmosphere of cordiality and kindness in our environment. We promote respect and trust between people. We value diversity in opinions, training and culture as a source of knowledge and competitive advantage.

We take care of the language we use when talking about third parties and we encourage the non-existence of defamatory guidelines and comments inside and outside the organization. We promote respect for real equality of opportunities between men and women, avoiding any scenario of direct or indirect discrimination.

No person employed by NWorld is discriminated against in the professional field because of race, physical disability, religion, age, nationality, sexual orientation, sex, political opinion or social origin. We maintain a work environment free of all discrimination and any conduct that involves harassment of a personal nature, not admitting any form of physical, sexual, psychological or verbal harassment or abuse.

In short, we represent the firm, always and in all situations and places, with ethics, responsibility and good treatment.

We know how to work in multidisciplinary teams, from different units, companies and countries, generating a climate of trust and mutual respect.

We provide the necessary conditions for our employees to work in a safe and healthy manner.

We comply with labor laws and regulations, respecting all workers' rights in accordance with the law. We contribute to the eradication of child labour.

We reject any manifestation of violence, exploitation or sexual, physical, psychological, moral harassment, abuse of authority or mistreatment

#### **Preservation and protection of the environment:**

The preservation and protection of the environment is a commitment of NWorld. We are actively and responsibly involved in the conservation of the environment, respecting legal requirements and trying to reduce the environmental impact of our activities. It is everyone's obligation to respect the environment by encouraging and promoting environmentally friendly actions.

#### **Integrity and confidentiality:**

We consider that all information obtained as a result of our professional relationship with clients is confidential, avoiding revealing such information personal or commercial in public or informal conversations with third parties. We refrain from providing internally or externally confidential data about the people and/or activities carried out at NWorld. We only provide the data that is necessary for other NWorld employees to properly perform their duties in strict compliance with this duty of confidentiality.

We provide those responsible with truthful, necessary, complete and timely information about the progress of the activities in our area; and to our colleagues to which is necessary for the proper performance of their duties.

We maintain the professional secrecy of the data, reports, accounts, balance sheets, strategic plans and other activities of NWorld and its persons which are not of a public nature, and whose disclosure may affect the interests of the company. We will not provide information about them except when we are expressly authorized to do so.

We obtain information from third parties in an ethical and legitimate way, rejecting any information obtained improperly or that involves a violation of company secrecy or confidentiality.

In general, we maintain the strictest confidentiality in the use of internal knowledge outside the scope of the company, preserving our know-how.

We will only use the computer systems, software, material, reports, etc. for which NWorld has acquired the corresponding license, respecting at all times the intellectual and industrial property of these.

The use of computer equipment is subject to NWorld's acceptable use of assets procedure, with the aim of avoiding damage to third parties or the company itself.

We will not use access to the systems to act fraudulently or for our own benefit.

### **Corporate Social Responsibility:**

NWorld is part of the United Nations Global Compact.

To ensure our faithful commitment to the Pact and its principles, practical measures are established within the company in four areas: human rights, labor standards, the environment, and the fight against corruption.

The principles of the United Nations Compact to which we adhere are the following:

**Principle 1:** Businesses should support and respect the protection of internationally proclaimed human rights within their sphere of influence.

**Principle 2:** Businesses should make sure that their partners and employees are not complicit in human rights abuses.

**Principle 3:** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

**Principle 4:** Businesses should uphold the elimination of all forms of forced and compulsory labor.

**Principle 5:** Businesses should support the elimination of child labor.

**Principle 6:** Businesses should uphold the elimination of discrimination in respect of employment and occupation.

**Principle 7:** Businesses should support a precautionary approach to environmental challenges.

**Principle 8:** Businesses should encourage initiatives that promote greater environmental responsibility.

**Principle 9:** Businesses should encourage the development and diffusion of environmentally friendly technologies.

**Principle 10:** Businesses should work against corruption in all its forms, including extortion and bribery.

## **Communication of irregularities.**

NWorld establishes the obligation for all its employees to report irregularities and non-compliance of which they become aware. To this end, it makes available to its employees and managers with the following communication channels:

- The Ethical Channel ([app.laworatory.com/multi-channel/nfq](http://app.laworatory.com/multi-channel/nfq))
- Mail: [cco@nfq.es](mailto:cco@nfq.es)
- In person, before the Chief Compliance Officer or another member of the Compliance Committee at the offices of C/ O'Donnell 34, 1º, 28009 (Madrid).

The channel may be used to communicate any type of non-compliance with the company's internal regulations, as well as non-compliance with the regulations in force in the countries in which NWorld operates.

Communications made through the ethics channel will be managed by the Compliance Committee and will always enjoy the utmost confidentiality, as well as respect for the person communicating in good faith, who will not receive reprisals for the use of the communication channel under any circumstances. In the same way, respect for the honour, the presumption of innocence of the person under investigation, as well as his rights of access and defence shall be guaranteed at all times.

## Integrated Management Committee

NWorld's Board of Directors has appointed a collegiate, independent and autonomous body for compliance management in the company. Its functions include supervising the Information Security, Criminal Compliance, Quality and Environmental Management System implemented at NWorld, as well as providing support and support to the entity's employees and managers, suppliers and collaborators in the event of any questions that may exist in terms of compliance with regulations, both internal and external.

For any communication or question to this Committee other than the communication of irregularities, an e-mail address is enabled: [compliance@nfq.es](mailto:compliance@nfq.es)

## Internal Regulations

NWorld has approved an internal regulatory regime that regulates the sanctions that the organization can impose on people who violate internal regulations, as well as those who commit internal fraud or crimes within the entity.

In any case, the sanctions contemplated in NWorld's internal regulations are aligned with the company's applicable agreements, as well as with the Workers' Statute. The internal regulations can be consulted on the NWorld intranet.

## Duration

The Code came into force after its approval on 04/13/2021. The Code has been implemented and approved, ratified and approved by the Company's Governing Body.

The Code will be communicated to all members of the Company. It will remain in force until its modification or cancellation is approved, which will be duly communicated.

Each of us is responsible for reviewing and following this Code, and we comply with all applicable laws, policies and guidelines. This Code attempts to address many of the situations we face on a day-to-day basis, but it cannot address every circumstances.