

## and Conduct



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ANGEL MALDONADO

CEO & Founder

Our industry -digital techtends to over-rationalise what a person is, objectifying the user as a lifeless thing whose behaviours are predictable. As a consequence, our industry

has created some of the most

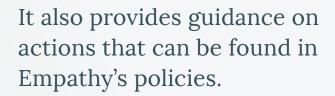
unethical products that the world has ever seen.

This Code of Conduct will give you to put data in-line to human values.

The Code of Ethics and Conduct



The Code of Conduct sets out the principles that determine our **ethical culture** and guide the behaviour of Empathy employees.



Compliance with the Code of Conduct is mandatory for Empathy employees, Managers and Executive Board members.

Empathy will promote the adoption of similar principles and values with our suppliers, contractors, partners and other third parties with whom we do business.

As part of our corporate culture, integrity must be at the heart of everything we do, with principles of action that involve:

Living our values, being coherent between what we say and what we do.



Acting with honesty, respect and responsibility in our relationships with customers, colleagues, society and the company itself.

Knowing and respecting the limits following the laws and regulations in force at all times.

Avoiding acting or engaging in inappropriate behaviour.



As an employee of Empathy your obligation is:

To understand and apply the guidelines of conduct established in this Code as well as the internal regulations that develop and complement them.

Not to tolerate, within your professional duties, behaviour that deviates from the Code or that may violate the internal regulations or the applicable legislation.



If you observe, or someone informs you, of an action or situation related to Empathy that may be contrary to this Code, please report it through the **Whistleblower Channel** available on our website.

WHISTLEBLOWER CHANNEL

#### Does it violate any laws or regulations?



Is it contrary to Empathy´s internal values or internal regulation?



Could my conduct be considered inappropiateor unprofessional?



In case of any doubts you can always follow the process below prior to making any decision or to contact the **compliance department** 

**CONTACT US** 



# VISSIO

We want to create an ecosystem where we can be challenged, where we can grow and develop, where we can be exposed to complexity and therefore maximise our infinite potential...

We strive to continuously push ourselves and enjoy the adventure together. We want to be imaginative, creative, inquisitive and intuitive.

Our aim is to to maximise our innovative capacity as a way to achieve growth and development.







Our vision is to live fully, to maximise our potential, to be creative and innovative but to base this on a steady flow of income which requires a good organizational model together with deliverables that are both functional and aesthetic.

We want to have our feet firmly on the ground but our heads and hearts reaching for the stars.way to achieve growth and development.

Vision





and that creating your future is easier than predicting it.



# We believe that work is not a necessary but an investment of

but an investment of time that must be joyful, pleasant and satisfactory. We believe that everyone deserves the opportunity to get to know themselves

and the world beyond our usual surroundings.

Anything you embrace or tackle has a measurement beyond numbers. Everything you decide to do is measured by the amount of life you are prepared to exchange for it.



A car, a holiday, a house or dinner are things that we tend to reason in monetary terms. However, if you stop for a minute to think about it, the expense of all these things is the amount of time you have dedicated

to obtaining that monetary reward. At Empathy we dedicate a lot of time and a large portion of our professional livest, so we want to make sure it's worthwhile.

## Our goals, our values





Trust, Joy, Understanding





### 5.1 Empathy General Principles

A. Compliance with applicable laws and internal regulations

Regulatory compliance is a prerequisite of this Code. Empathy employees must comply with all applicable laws and regulations in each and every country where Empathy sells its products.

Empathy employees
must comply with the
company's internal
regulations and
procedures, and follow
any instructions that may
be given in the application
of these regulations
and procedures.

For the sake of internal control, the decisions

of Empathy employees must be traceable from the point of view of compliance; therefore, when such decisions are reviewed by any authorised third party or by the company itself, their compliance with internal and external regulations must be evidenced and verified.

In case of non-compliance with this Code, the company has a consultation and notification procedure that allows any person related to the company to confidentially report any irregularity that may involve a breach of the Code.

B. Human Rights Protection

At Empathy we understand that Human Rights are a set of prerogatives based on human dignity, whose effective realisation is indispensable for the comprehensive development of the person.



We promote, within our sphere of influence, respect for the human rights recognised in the United Nations Universal Declaration of Human Rights.

Compliance with human rights is also a fundamental pillar in the relationship with our suppliers, contractors and

other partners. Empathy's Supplier and Clients Code of Ethics specifies the standards of conduct expected of suppliers who have a business relationship with the company. We do not want to work with third parties who are not diligent in protecting and safeguarding human rights.



C. Sustainability and Environment commitment.

initiatives to promote environmental responsibility and encourage both the development and diffusion friendly technologies.

> Likewise, in our relationship with customers, suppliers or partners, employees will transmit our principles and enforce compliance with the environmental procedures and requirements that may be applicable in each case.

Future extensions or new buildings carried out by Empathy will be carried out in accordance with current legislation on urban and environmental matters.



#### D. Social Contribution

At Empathy, Corporate Social Responsibility, understood as a social and environmental commitment in the development of its activity, beneficial to all its stakeholders, is an integral part of its way of doing business.



Empathy's social commitment is materialised in sponsorship activities and social actions, carried out by the organisation itself.



We support projects that promote social cohesion and an inclusive society, as well as projects that help to protect nature and the environment.

Similarly, Empathy encourages and promotes the collaboration of its employees with non-profit or charitable organisations wherever it operates through volunteer programmes.

We are aware that we have a substantial responsibility to society and our environment, therefore, Empathy will value monetary donations and non-monetary contributions when the projects and needs of society are aligned with our ethical values. We do not make financial donations to political parties or similar institutions, nor to individuals.

#### E. Corporate reputation

Empathy considers its corporate image and reputation as one of its most valuable assets in order to preserve the trust of its Employees, Partners, Customers, Providers and society in general.

All those involved with Empathy will preserve the image and reputation of the Company in all their professional actions, while considering the interests of local communities, especially in the international context.

Likewise, Empathy will ensure the correct and appropriate use of the corporate image and reputation by employees and partners.



Empathy employees must be especially careful and aware in any public events concerning media, participation in events and professional conferences or seminars, social networks as well as any other activity that may have a public exposure.



F. Intellectual and industrial property

Empathy is committed to protecting its own and others' intellectual and industrial property. This includes, among others, copyrights, patents, trademarks, domain names, reproduction rights, design rights, database extraction rights and rights over know-how.

This also applies to any products, know-how, market information, price lists, advertising campaigns, etc., the access, disclosure and use of which are classified as confidential information or are protected by patents, trademarks or copyrights.

> It is expressly forbidden for any member of staff to use any works, creations or distinctive signs of intellectual or industrial property of third parties, without prior accreditation that the company has the corresponding rights and/or licences.



Intellectual and industrial property rights resulting from the work of the employees while they provide their services to the company and related to the current and future business of Empathy will remain the property of the company.







G. Confidentiality and data protection

Empathy is strongly committed to the ethical importance surrounding personal data and ensures that it complies with national and international data protection regulations.

In particular, one of the ethical values of the company lies in the principle of avoiding the collection and processing of personal data. This is why our products do not involve the collection or processing of personal data for optimal and efficient purposes, while respecting the privacy of individuals at a higher level.

This is why Empathy considers that information and knowledge must treated with special protection.

Empathy may come to know and process personal data (legal representatives, customer contact data, Empathy's employees) within the area of professional development.

We take into account that the protection of personal data is a fundamental right and we will protect the data of our customers, suppliers, employees and any other person.

Likewise, Empathy will maintain the confidentiality of all information classified as such, as well as any other type of information of a strictly professional nature that is accessed for work purposes.

Empathy will adopt the necessary measures to collect, store and access these data in accordance with the applicable regulations, avoiding improper access and complying with the internal regulations on the matter.



H. Device security

Empathy provides employees with all assets that are necessary to perform the job.

Empathy will ensure that these assets are used in a responsible manner, limiting their use to business purposes.

Empathy will ensure that no one may appropriate company assets that have been made available for the performance of professional activity.

Likewise, employees must have the proper authorization for the installation or use of computer programs or applications on Empathy-owned equipment.

All employees must comply with the security measures established in the equipment and computer systems of the company.

The control of these means shall be carried out in accordance with the provisions of the policies established for this purpose.



Some of the assets empathy provides to employees



I. Conflicts of Interest

Empathy employees will avoid any situation that may involve a conflict between their personal interests and those of the company.

This includes refraining from representing the company and from participating or intervening in decision making in which they may have, directly or indirectly, themselves or through related persons, any personal interest.

the company to obtain any economic or personal benefit, nor any business opportunity for themselves.

Likewise, Empathy respects and guarantees the private life of its employees, especially in the private sphere of their decisions.

Within their professional activities with Empathy, employees can not request, accept, promise, offer or give gifts, payments, commissions or any other personal benefits.

Employees must report all personal gifts and benefits received or given, third party events attended as a guest, as well as events organised where third parties are invited, unless otherwise approved by the Company.

That is why Empathy encourages its employees to communicate to the Ethics and Compliance Committee if there are any personal conflicts of interest or that of their family members, which may compromise the necessary objective or professionalism of their role within the company, while respecting the confidentiality and privacy of individuals so that appropriate measures are taken for the mutual benefit of the company and the persons concerned.

No member of Empathy may use their position in

#### J. Corruption, bribery and fraud

We are against corruption in all its forms, and we do not tolerate fraud under any circumstances.

At Empathy we do not tolerate or resort to unethical practices with the aim of influencing people's will and obtaining irregular advantages. We will act in accordance with applicable laws, and under no circumstances will we allow payments, commissions, advantages or privileges of any kind for unethical purposes.

For business meals or travel, the guidelines set out in Empathy's Expenses Policy and Travel Policy will be followed.

Furthermore, Empathy is a politically neutral company and we do not directly or indirectly fund political parties or related organisations, their representatives or candidates.



report any breach of current anti-corruption regulations to the Ethics and Compliance Committee.

K. Tax liability and prevention of anti-money laundering.

We believe Anti-money laundering and the financing of terrorism are a blight on the developmentand wellbeing of society.

All persons related to Empathy must comply with the applicable legal provisions and with the provisions of this Code, as well as the Codes of Ethics of Suppliers and Customers and pay special attention to those cases in which there are indications of lack of integrity of persons or entities with which they maintain business relationships.

In Empathy we are committed to establishing as good practices by the control authorities in tax and fiscal areas.

We avoid obtaining undue advantages for the company in tax matters, and we ensure that the information declared to the authorities is truthful and



accurately reflects the reality of the company. We also ensure that any public aid, subsidies or other funds of which the company may be a beneficiary are used exclusively and diligently for the purpose for which they were granted.

#### L. Whistleblowing Channel

Empathy has made a channel that allows to communicate confidentially those actions that may be considered to violate the principles set out in this Code available to its employees and any person involved with the organization (customers, suppliers, partners...).

The Ethics and Compliance Committee may act on its own initiative or at the request of any duly identified employee or stakeholder.

Complaints may be communicated to the Ethics and **Compliance Committee** through

WHISTLEBLOWER CHANNEL

Empathy has a Whistleblowing Channel Procedure that develops the requirements contained in this section.

The Ethics and Compliance Committee is committed to resolving any matter that is submitted to its competence.



M. Free Markets

Empathy acts in the markets fairly and with respect for free market competition, complying with the national and international rules in force.

We compete without engaging in misleading, abusive or anti-competitive practices and we do not discredit our competitors in bad faith.

We will seek information from third parties, including

competitors, in an ethical manner and in accordance with applicable antitrust laws.

We will take the utmost care to avoid violating trade secrets when bringing people into the company.

#### 5.2 Employees

N. Diversity and Inclusion.

the recognition, enjoyment or exercise of human rights and freedoms, for any reason, including origin, nationality, race, gender, marital status, pregnancy, sexual orientation, disability, age, opinions and ideas, neurocognitive diversity, association or union membership.

At Empathy we promote diversity and inclusion because we believe that the diversity of our employees can contribute value in an environment of equal rights and duties.

Likewise, we don't discriminate against people by avoiding any distinction, exclusion, restriction or preference that is not objective, rational or proportional and has the purpose or result of hindering, restricting, preventing, impairing or nullifying



In accordance with the new regulations in relation to remote work, Empathy will offer the necessary tools so that all workers can develop their professional work. In this sense, Empathy will guarantee compliance with article 11 of the Workers' Statute for all its employees.

We reject any manifestation of harassment, abuse of authority, as well as any other conduct that may generate an intimidating, offensive or hostile work environment. We favour a pleasant and safe, physical and psychological, working environment.



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Empathy has implemented policies that reflect its commitment to the prevention and suppression of all forms of harassment in our environment. Empathy has defined sexual harassment

and gender violence protocols. In addition, we promote the training of our employees in bias awareness with the aim of detecting and addressing them to be more empathetic and respectful in all we do.

#### O. Merit and equal opportunities

Processes and procedures are established taking into account as many objective measurements as possible so that we can avoid any type of discrimination.

Training is a fundamental pillar that allows us to improve the skills of our employees. We provide them with time and resources to be able to keep up to date, encouraging them to expand their knowledge and go further in their professional development. We do not make distinctions between employees when providing these benefits.

In addition, we have all job positions defined and complemented with different career paths for each. Therefore everybody within the company knows what is expected in all positions and what are the requirements needed. The aim of this is to make performance evaluations as objective as possible to help to make the best decisions related to the employee's careers.

Likewise, at Empathy we are committed to a real balancee between people's professional and personal lives offering benefits such as remote work and flexibility in the working hours



P. Preserving health and safety at work

Empathy has a duty to provide all employees with safe, healthy working conditions and to enhance these continuously.

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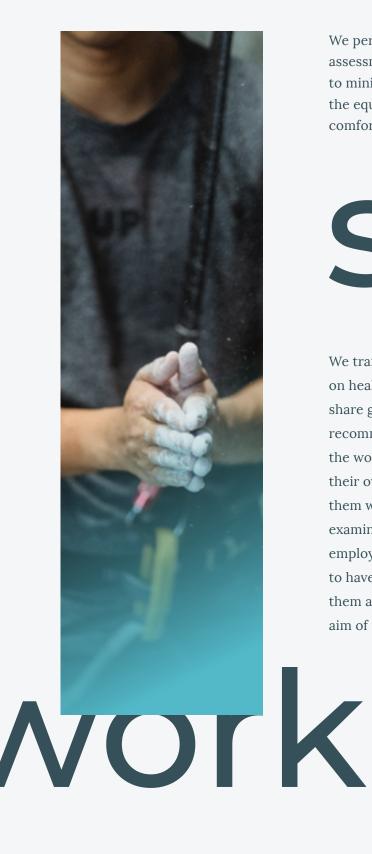
We comply with the Guidelines on health and safety at work.

If a dangerous situation arises, we make sure that our colleagues are informed appropriately.

We act cautiously so as not to endarger others.

We report all hazardous incidents to our managers.

nealth



We perform regular hazard assessments and take measures to minimise risks. We provide the equipment needed to be comfortable and avoid risks.

## safety at We train our employees

on health and safety, and share guidelines with recommendations to keep the workstation safe, even in their own home. We provide them with an annual medical examination and every employee has the opportunity to have a health insurance for them and their family with the aim of promote health care.



#### 5.3 External relations

Q. With Customers

The satisfaction of our customers with the services provided by our company is the primary objective of our business activity.

All relationships that Empathy maintains with its customers will be duly documented in the legally appropriate form and expressed in clear terms that allow the rights and obligations arising from these relationships to be precisely determined.

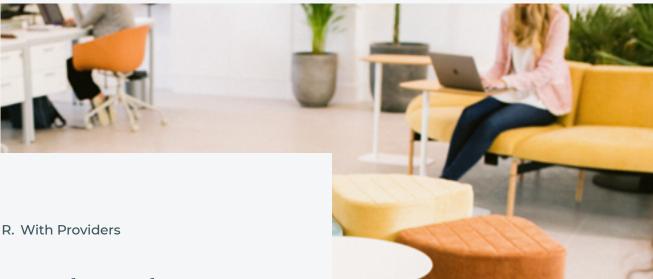




All employees shall be obliged to act, in their relations with customers, in accordance with a criteria of respect, dignity and justice, taking into account the different cultural background of each individual, without allowing any kind of discrimination and with special consideration for the care and assimilation into working life of disabled or handicapped persons.

In the development of their activity, Empathy employees will promote the company's products based on objective standards, without distorting their description or characteristics.

The company shall carry out promotional activities in an honest manner, so that it does not provide false or misleading information that may mislead its customers or third parties.



Empathy employees will maintain a lawful, ethical and respectful relationship with their suppliers.

The choice of suppliers shall be governed by principles of objectivity and transparency, combining the interest of the company in obtaining the best conditions with that of maintaining stable relations with ethical and responsible suppliers.

Each and every one of the suppliers who work with Empathy will respect the human and labour rights of all the employees contracted.

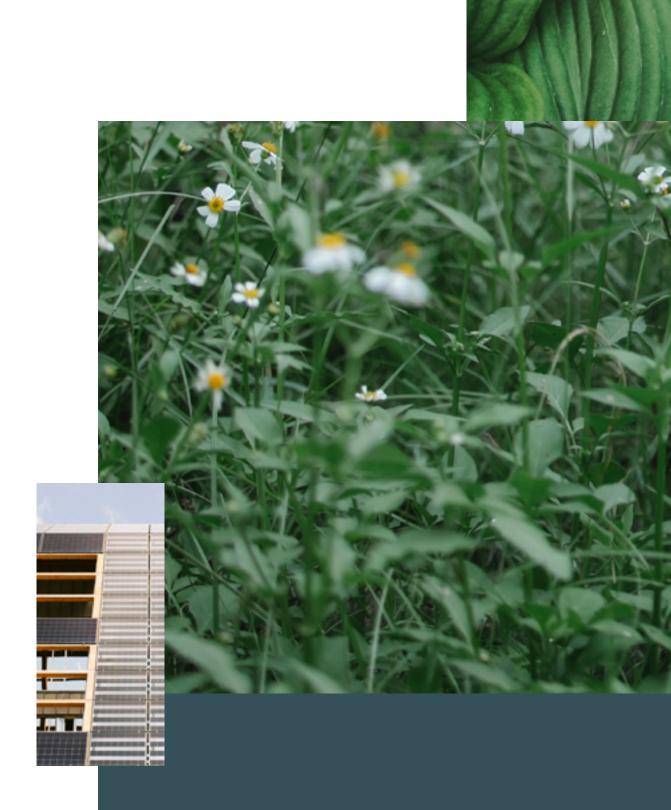


The activities carried out within the framework of purchasing and procurement will be carried out in full compliance with the regulations and corporate procedures in force, especially in accordance with the Supplier Code and procurement procedure that complements our internal regulations.



Empathy's Code of Ethics and Conduct has been approved by the Ethics and Compliance Committee on XX, XX, 2023 and will remain in force until its revision or modification is approved.

Reviews of the code, as well as of the policies that complement it, will be carried out by the Ethics and Compliance Committee as often as necessary to ensure its effectiveness and that its contents are in line with the most relevant ethical and compliance issues for the organisation, and will be duly communicated to all company employees.



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