

This code provides the legal and ethical framework for the conduct of ARTECA's directors, officers and employees (hereinafter referred to as employees). It defines the basic rules of conduct within ARTECA and in relation to its business partners and third parties involved to ensure that the right thing is done and that, in its logical consequence, no offence is committed within the company.

It provides a guide for all ARTECA employees in their professional performance concerning their daily work, the resources used, and the business environment they work in. This Code is addressed to all ARTECA employees, regardless of the contractual modality that determines their employment relationship, the position they hold or the place where they perform their work.

This code also establishes the fundamental values to which ARTECA aspires and represents its identity as a collective and related to employment, work and safety, as well as the protection of the environment.

ARTECA is committed to respecting human rights, complying with employment legislation (allowing freedom of association, eradicating child, forced or compulsory labour and eliminating discrimination), and taking action to respect the environment.

To a large extent, ARTECA's reputation is determined by the actions of its employees and the way they portray and behave. Illegal or inappropriate behaviour by a single employee can cause considerable damage to the company.

The principles of ethical behaviour that govern ARTECA are based primarily on loyalty and good faith towards the company, peers and associates with whom we interact. It is based on the honesty of all employees and mutual respect. We operate respecting the confidentiality of the data and information processed in ARTECA, both from outside and inside the company.

The following sections summarise the most important principles of our Code of Conduct and represent standards of conduct for all ARTECA employees:

1.- Human rights, employment and safety at work.

- No discrimination is permitted between employees based on their ethical, cultural or religious background, age, disability, gender, race or sexual identity.
- Strive to ensure a respectful working environment, free from abusive or harassing behaviour.
- Continually pay attention to safety in the workplace.
- Ongoing employee training for professional growth and efficient job performance.

2.- Environmental protection.

- To be aware of and strictly comply with all environmental laws and regulations.
- To contribute to the achievement of the conservation of natural resources through our behaviour that goes beyond the requirements of current legislation.

3.- Corruption.

It shall not be permitted under any circumstances:

- Offer or grant a benefit to a public official.
- To offer, grant or accept any economic sum for one's benefit or the benefit of ARTECA.
- Offer, grant or accept benefits of a sexual or immoral nature.
- Request a business partner for a personal benefit or ARTECA.

4.- Basic payment rules

- Payments made on behalf of ARTECA must be performed by bank transfer as a basic rule, except payment in cash and always in compliance with current legislation.
- No employee shall make, approve or instigate payments by the Company to himself/herself or any related person.

5.- Loyalty. Conflict of interest.

- ARTECA employees shall not engage in any activities competing with our Company or attend any other activities that directly or indirectly compete with ARTECA.
- ARTECA employees must disclose to Company management any interest or involvement they have in a client, supplier or other business partners of the Company.

6.- Corporate Assets.

It is forbidden:

- Remove property from the Company's premises unless explicitly authorised (except for approved mobiles and laptops).
- Use company property for private or third-party activities.
- Make copies of computer programmes owned or licensed for use by the Company or install a computer programme or other software on the Company's computer system unless authorised explicitly by ARTECA.
- Extract company files unless explicitly authorised by ARTECA.

7.- Confidentiality.

We are under obligation to:

- Ensure that we do not disclose confidential Company know-how or documentation to a third party without having a contractual relationship with the recipient.
- Keep information disclosed to us confidentially as if it were the Company's confidential information.

8.- Data security and personal data protection.

- Employees must be aware of and comply with the applicable laws and regulations on privacy and data protection.
The term "personal data" includes all data relating to the individual (such as name, address, telephone number, date of birth, salary, professional category, marital status) regardless of whether the individual is an employee, client or any other person.
- Company information must be protected against unauthorised or accidental disclosure. Personal information should not be shared with any party that does not have a legitimate business need to know that information. This applies to all information, regardless of its format, whether verbal or written, physical or electronic.

9.- Communication.

As employees we must:

- Take special care to communicate at all times in a polite, professional and courteous manner.
- When it comes to external communications: clients and suppliers, we must not disclose forecasts of the Company's financial or commercial data unless ARTECA has officially published it.
- Be diligent and careful when composing and sending e-mail messages.
- The Company's financial department must exclusively do all communications to banks.

10.- Whistleblowing Channel.

Employees reporting a violation that they either know about or have good reason to believe has occurred will not be subject to retaliation or unfavourable treatment for making the report. If the reporting employee requests, the employee's identity will be kept secret unless otherwise required by law.

The channels for reporting complaints are: email: complaintschannel@arteca.net .

Both nominative and anonymous complaints may be sent to this email address.

The Code of Ethical Conduct came into force following its approval by The Administrator in June 2022.

The Code will be communicated to all ARTECA members. The Code will remain in force until its modification or cancellation is approved and will be duly communicated.

We each undertake to review and follow this Code and comply with all applicable laws, policies and guidelines. This Code attempts to address many of the situations we face daily, but it cannot address all circumstances.

All of us must report to our manager any conduct that we believe, in good faith, to be a violation of the Code of Conduct.

We do not discriminate or retaliate against employees for reporting, in good faith, genuine and proven violations. ARTECA's management will ensure compliance with this Code, resolve incidents or doubts about its interpretation and adopt the appropriate measures for its best compliance.

Failure to comply with this code may lead to adopting disciplinary measures and, if necessary, exercising the appropriate legal actions.

Villabona June 2022
ARTECA Administrator
Alexandre ABERGEL

