



ETHICAL CODE



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ETHICAL CODE

PURPOSE AND SCOPE OF APPLICATION

- 1) Purpose:** the purpose of this Code is to promote an ethical culture that expresses the founding values and principles of **DESARROLLO MULTILATERAL S.L.**, hereinafter **DEM**.
- 2) Scope of application:** this Code applies to all DEM staff, regardless of their employment status or position. Similarly, this Code of Ethics shall apply to all external staff acting on behalf of and representing DEM. The Code is expressly accepted by all DEM members, who agree to be familiar with and accept its scope from the date of commencement of their employment, professional or service relationship with DEM, and it will be attached to the contract of those who join the organisation. Familiarity with the Code is a necessary and essential condition for commencing and maintaining an employment relationship with DEM.

ETHICAL VALUES AND PRINCIPLES

- 1) Professionalism:** DEM bases its activities on the principles of respect, efficiency and equality, setting an objective and independent tone in its actions and decisions. In order to safeguard the principles of integrity and objectivity, DEM values independence of action at the highest level, always excluding arbitrary exercise. Similarly, professionalism shall include professional secrecy and confidentiality in general, a necessary condition for initiating and maintaining any employment relationship with DEM.
- 2) Equal opportunities and non-discrimination:** DEM provides equal opportunities in access to work and professional promotion, above all with an attitude open to diversity, ensuring at all times the absence of discrimination on the grounds of sex, sexual orientation, race, origin, ideology, religion, functional diversity, marital status or social condition.

DEM has a working environment free from sexual harassment and a Protocol for the Prevention and Eradication of Harassment in all its forms and aspects.

- 3) Transparency:** Belonging to DEM implies an active commitment to transparency and honesty in its professional activities.
- 4) Respect:** Both senior management and other DEM bodies will promote respect for the dignity of others at all times, avoiding behaviour that damages or jeopardises interpersonal relationships, which is necessary for participation in the other objectives and principles that guide the ethical and professional conduct of the organisation.
- 5) Continuous training:** DEM values the professional development of its members, promoting the updating of professional knowledge and skills, as well as providing the necessary tools for their training and professional consolidation.
- 6) Prevention of occupational risks:** DEM considers occupational health and safety to be fundamental to achieving a comfortable and safe working environment, with the continuous improvement of working conditions being a priority objective.
- 7) Environmental protection:** DEM participates actively and responsibly in environmental conservation and the fight against climate change, and its members must therefore follow the recommendations of the Environmental Decalogue established to reduce the environmental impact of their activities.
- 8) Integrity, Anti-Corruption Policy:** DEM absolutely rejects any form of corruption or bribery, whether in the public or private sector. In this regard, persons subject to the Code of Ethics have a responsibility to ensure that the entity does not engage in any type of corrupt behaviour or practice, and must use all means to identify any signs of bribery by a third party. Within the scope of their powers, persons subject to the Code must ensure compliance with current legislation, internal policies and, in particular, the general principles governing public procurement processes.

- 9) Honesty:** Persons subject to the Code shall conduct themselves in an honest and responsible manner. For DEM, the integrity of its staff is a fundamental element of its credibility vis-à-vis third parties.
- 10) Privacy protection and personal data protection:** DEM is committed to protecting the privacy and personal data of its employees, suppliers, and customers. In this regard, persons subject to the Code shall have all means available to them for the protection and proper processing of personal data to which they have access in the exercise of their professional duties.
- 11) Confidentiality:** The recipients of this Code undertake to maintain the confidentiality of the information acquired in the course of their activities at DEM.
- 12) Security:** Persons subject to the Code undertake to use all available security measures to protect the information they access as a result of their professional practice.
- 13) Innovation:** DEM promotes innovation, the improvement of technical skills and the free exchange of ideas among its employees. In this regard, DEM provides a safe space for the formulation of ideas and improvements in the services it offers to customers, partners and stakeholders.
- 14) Community development:** DEM is committed to generating shared value with society and contributing to the progress of the communities in which it operates. It therefore encourages the establishment of relationships of trust and continuous, reciprocal communication with citizens and institutions in order to achieve solutions that integrate the specific needs of each community, promoting social acceptance under a firm commitment to respect and promote human rights.



The commitment to generate shared value with the communities in which it operates is realised through social projects, collaborations, sponsorships and donations with public, private and third sector entities (non-profit entities and non-governmental development organisations).

EFFECTIVENESS AND EFFICIENCY COMPLIANCE

Persons subject to this Code, in addition to complying with the legal regulations in force at any given time, are obliged to be familiar with and comply with the Code of Ethics, and must adjust their professional activity to the principles and criteria established therein.

Failure to comply with the instructions contained in this Code, without prejudice to any other administrative, civil or criminal liability that may arise from such failure, may result in the adoption of disciplinary sanctions in accordance with current labour legislation.

Any questions regarding the Code of Ethics may be addressed directly to the Head of the Anti-Bribery Management System (Anti-Bribery Compliance Function) at DEM, who will respond to and resolve them.

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General Management

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