



— sipay —

| **CODE OF CONDUCT**

SIPAY has been developing its activity, currently consolidating itself as a benchmark in payment solutions aimed at guaranteeing the best user experience, with the aim of helping our customers to increase the conversion rate of their business.

The leadership position achieved by SIPAY obliges us to strive to maintain our image and corporate responsibility intact, acquiring and sharing our firm commitment to national and international regulatory compliance applicable to all our activities.

We are proud to recognize that SIPAY is made up of a great highly qualified team, with a clear vocation for service and customer service, which keeps us in high standards of quality and loyalty. We are convinced that a large part of the prestige obtained has been due to the strict respect for our values that are summarized in this Code of Conduct.

These values are the foundation of our company's culture and must guide the behaviour of each of the people who make up SIPAY, aware that the best way to transmit them is through personal example, and that the image, prestige and seriousness of our organisation are at stake in the actions of each one of us.

With this Code of Conduct, we want to share our commitment to legal compliance and the framework on which we develop our policies and other internal regulations, which are essential in the areas of ethics, information security and personal data protection, the fight against fraud and corruption, and the constant improvement of social and environmental responsibility.

Through this code, we formalise SIPAY's commitments, with the aim of guaranteeing the sustainable growth of the company and enhancing the feeling of pride and belonging of our staff.

It is the responsibility of all of us who are part of SIPAY to defend the commitments and principles established in this Code of Conduct, allowing us to maintain in the long term the relationship of trust on which SIPAY relies in its day-to-day work with its staff, collaborators, suppliers, customers, partners, financial institutions and competent authorities.

All of us who are part of SIPAY must assume the individual responsibility of complying with the values and precepts defined in this Code of Conduct, as well as commit ourselves to making these rules known and enforced at all levels of the company, to our customers, suppliers and other interested parties, always collaborating with the example of our actions both inside and outside the company.

Sole Administrator

José Luis Nevado

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# sipay

## INTRODUCTION

**Plan de pagos**  
Selecciona como quieres fraccionar el pago

☒ 3 meses 205,00€/mes

☐ 6 meses 106,50€/mes

☐ 12 meses 57,35€/mes

**Reembolso 83,48€**

Escaneado 23 mayo, 12:37  
**PALACIO Y MUSEOS** 25,73€  
296,25€ Reembolso

Escaneado 20 mayo, 15:29  
**PALACIO Y MUSEOS** 57,75€  
550,00€ Reembolso

woodmerry

ID trans.	ID cliente	Cantidad	Moneda	TPV
76534	132	35,50	EUR	5
76512	433	10,90	EUR	1
75999	134	120,60	EUR	7
75679	132	2,80	EUR	37
75589	433	73,00	EUR	10

**sipay**

**uinku**

Total  
**529,87€**

## WHAT DO WE EXPECT WITH THIS CODE OF CONDUCT?

We expect those who know and subscribe to it to maintain a high level of compliance and ethics in the performance of their professional work in and with SIPAY, in accordance with current regulations and the policies that are applicable to each activity and time.

Ignorance of the law does not exempt from complying with it. The same applies to the rules that apply to the performance of their work in and with SIPAY.

Before making a business decision, ask yourself the following questions:

1

Is my decision in line with SIPAY's Values and Code of Conduct?

2

Is it legal? Remember that if in doubt you should ask for advice

3

Would I proudly share my decision?

If you're not sure, don't make the decision until you get help or advice.

✓ **Read, Understand, and Comply** this Code of Conduct and SIPAY's rules and policies, laws and other regulations applicable to the performance of your work at SIPAY or as a SIPAY supplier.

✓ **You can always consult the online version** of this Code of Conduct and will have at its disposal the specific rules and policies that are applicable to it in the updated version.

✓ **Ask the Compliance Committee for professional guidance** If you have questions about best business practices, regulatory compliance, or how to act in a specific situation.

✓ **Do not hesitate to report any possible violations** or this Code of Conduct, or SIPAY's internal regulations through our Whistleblowing Channel. The communications you submit will be treated with absolute confidentiality, impartiality and agility. Please remember that you can make anonymous communications and that we ensure whistleblower protection.

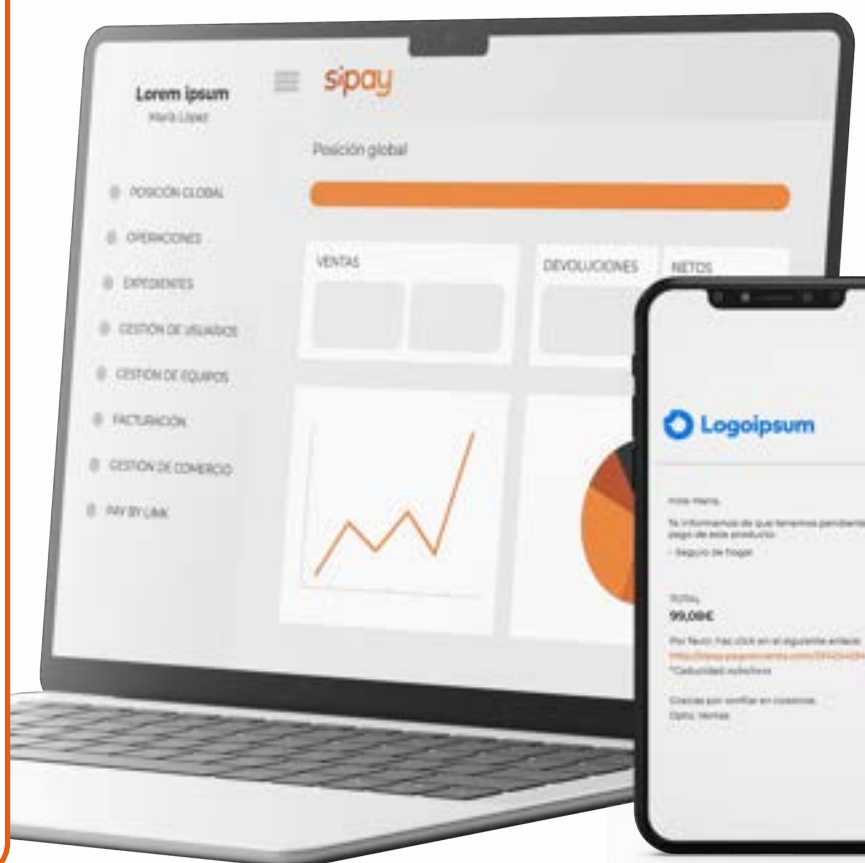
✓ **Communication, sensitization and awareness are essential to optimize compliance in SIPAY.** For this reason, we ask you not to miss the practical information and training sessions to which you are summoned to know, understand, comply with and certify your level of knowledge on compliance, prevention and minimization of criminal risk in SIPAY.

## PURPOSE AND SCOPE OF THE CODE OF CONDUCT

**This Code of Conduct is an extension of our values because it reflects our commitment and responsibility to ethics, legal compliance and good business practices.**

- ✓ This Code of Conduct is applicable to all members of SIPAY PLUS, SL and SIPAY Group companies adhering to the criminal risk management system: NEVADO VIÑARAS S.L., WOONIVERS SPAIN S.L., UINKU PAYMENTS S.L. and VIVO SERVICIOS DE COMPRA S.L. (hereinafter, GRUPO SIPAY, SIPAY or the company).
- ✓ No person, regardless of level or position, is authorized to solicit a SIPAY member to contravene the provisions of this Code. In the same way, no member of SIPAY may justify improper or illegal conduct under the order of a superior.
- ✓ SIPAY will promote the application of the provisions herein, to the extent applicable, to its interested parties, suppliers, service providers, customers, financial institutions and other third parties with whom it relates in the exercise of its activities.

- ✓ The Code of Conduct helps us to make the right decisions, even if it is not designed to guarantee compliance with all situations that may arise for any person or entity that has a relationship with SIPAY.
- ✓ This Code of Conduct is a reference framework that is not a substitute for specific legal regulations or other company-specific procedures and instructions.
- ✓ Our commitment is to establish relationships that are respectful, ethical and comply with legal requirements.





# MISSION, VISION AND VALUES

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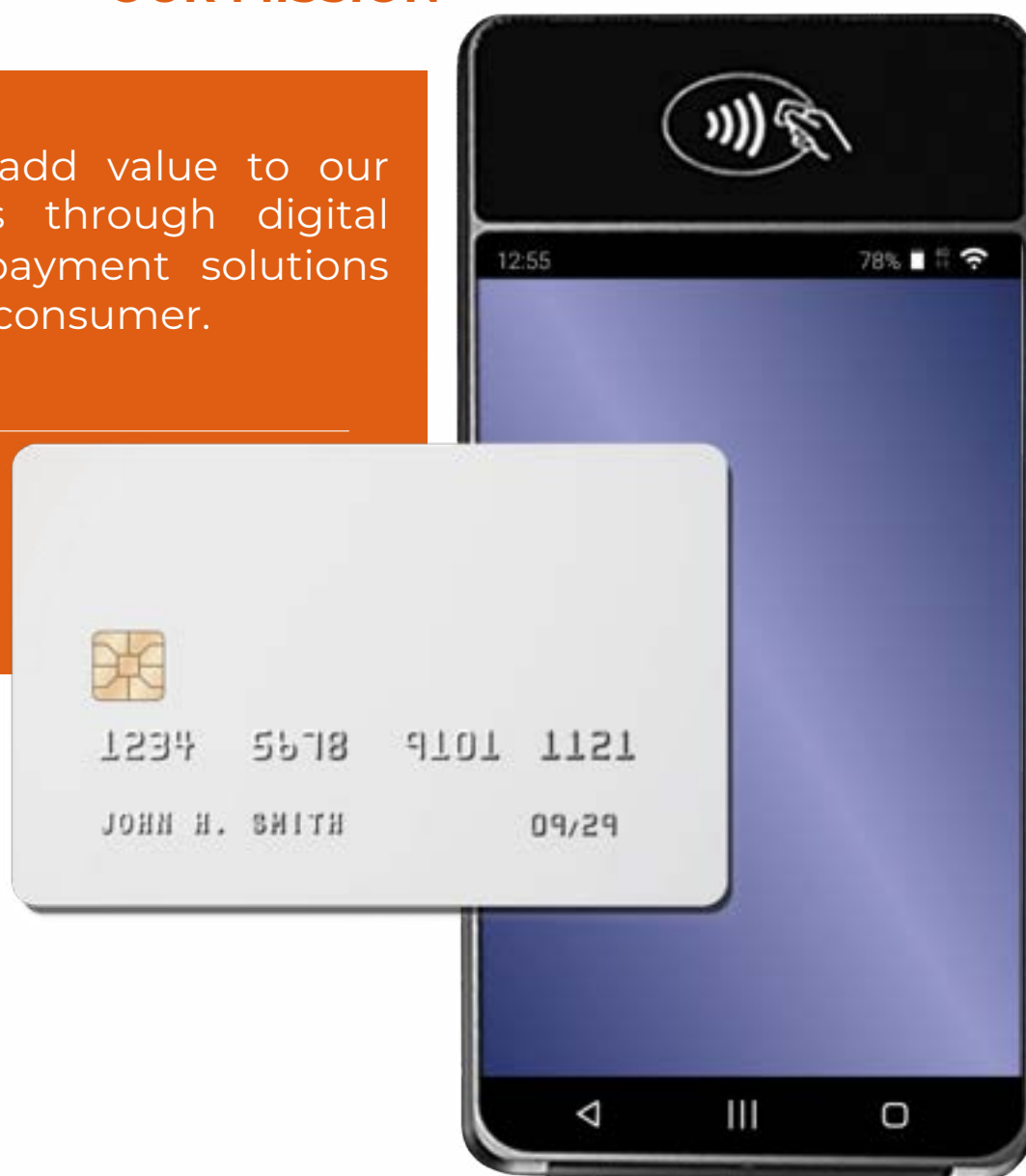


## OUR VISION

We want to be the one-stop shop for our customers, helping them sell more by creating "value beyond payments".

## OUR MISSION

Our goal is to add value to our clients' business through digital shopping and payment solutions that engage the consumer.





# OUR VALUES

What do we call "values"?"

- ❖ It is the set of beliefs that guide our behavior. Companies, like people, have values.
- ❖ Our Standards of Conduct help us live in alignment with our values, including our commitment to impeccable ethical and legal behavior.
- ❖ Our values must be present in all our relationships and be the common basis of our actions and behavior.
- ❖ SIPAY maintains a firm commitment to responsibility and integrity, respect for the dignity, confidentiality and rights of all, and encourages solidarity and sustainable development initiatives. Our success and sustainable growth depend on the trust of our customers, collaborators, and business and social partners.



## Integrity

We promote respect and honesty, since we believe that they are two essential principles in our company and in its interaction with the different agents with whom we interact, whether they are clients or partners. A relationship based on trust is always the best way for things to work, problems to be minimized and errors to be resolved as quickly as possible.



## Leadership and commitment

There is no leadership without commitment, since a leader is not defined by his position but by his attitude and the ability to support, inspire and motivate the people around him. Growth is something we cannot achieve alone, and that is why we want to do it together with our team and our clients, listening and learning from each other.



## Obsession with customer satisfaction

All clients are different and have very specific needs. For this reason, we want to be allies in your projects, guiding your strategy in what we know best, which is payments. And to achieve this, we always place the end consumer at the center of the strategy, analyzing their needs and preferences, because we know that their satisfaction will be the greatest benefit we can offer to those businesses that trust us.

# Innovation and dynamism

Our sector, linked to technological advances, leaves us with a scenario of constant change, in which payment solutions, as well as the needs of our clients, evolve unstoppably. We do not want to be only those who adapt, we also want to be part of the engine that drives innovation, which is why we seek research and continuous learning. In our philosophy there is nothing impossible, because with technology everything can be done, and it only takes a little time and effort to carry out an idea.



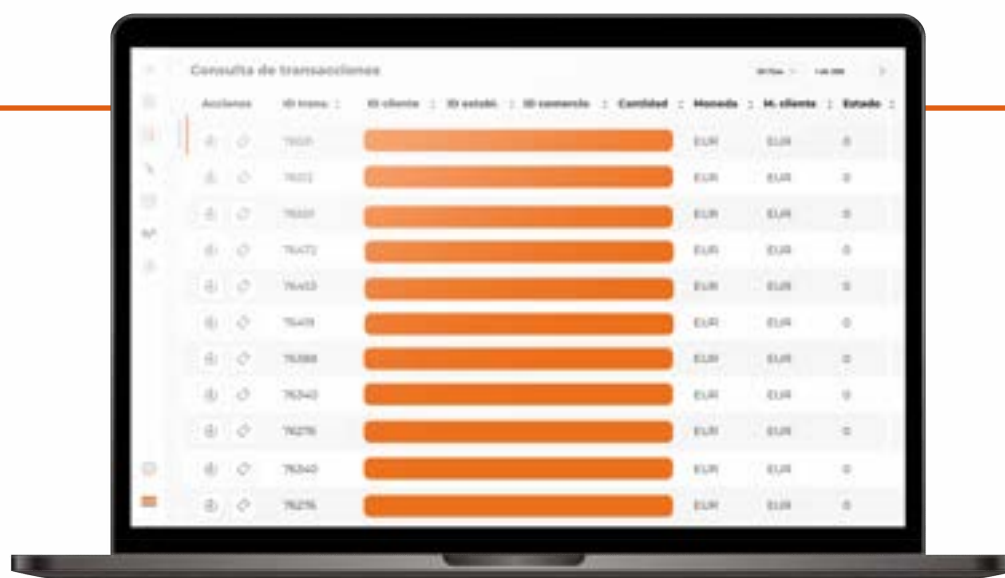
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## OUR COMMITMENTS



## RESPECT FOR LEGALITY

- ✓ All SIPAY members must comply, in addition to current legislation, with the rules and procedures established internally, as well as those that may be developed in the future. Under no circumstances may these internal regulations entail a breach of the legal provisions in force.
- ✓ SIPAY recognises and respects the diversity of cultures, customs and business practices present in the international market.
- ✓ SIPAY is firmly committed to complying with international conventions, laws and regulations applicable to its activity in Spain and Europe, and those of those local markets in which SIPAY carries out its activities.
- ✓ The adequacy of the decisions taken by the members of the Company to internal and external rules must be justifiable, verifiable and verifiable in the event of review by competent third parties or by the company itself. SIPAY is committed to providing the necessary means for its employees to know and understand the internal and external regulations necessary for the exercise of their responsibilities.
- ✓ Through this Code of Conduct we want to materialise the principle of due diligence aimed at the prevention, detection and eradication of irregular conduct, whatever its nature, taking into account the principle of criminal liability of legal persons included in the Spanish legal system.



At SIPAY we market our services in a sustainable way. **responsible**, with the aim of increasing and maintaining the trust of our customers.

Our commitment to **integrity** It will always go hand in hand with the personal development of our team aligned with new services, products and markets.

# RESPONSIBLE LEADERSHIP



# PROTECTION OF RIGHTS



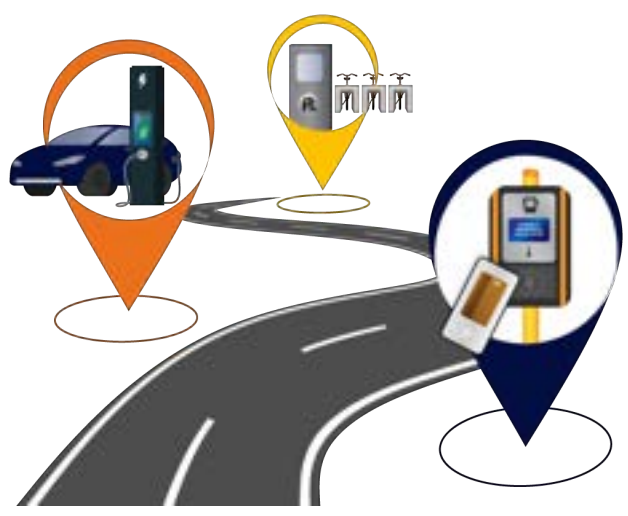
At SIPAY we take great care to comply with the regulations of the countries in which we operate, as well as the **Protection of the rights of customers, users, suppliers and other interested parties.**

Our commitment to the fulfilment of human rights is based on respect for the UN Guiding Principles on Business and Human Rights, specifically SDG 16; the UN Universal Declaration of Human Rights; UN International Covenant on Civil and Political Rights; the UN International Covenant on Economic, Social and Cultural Rights; the Declaration of the International Labour Organization on Fundamental Principles and Rights at Work, as well as Spanish national regulations on privacy and protection of personal data, human trafficking, information security, labour rights, freedom of expression, among others.

# QUALITY COMMITMENT



Our quality objectives are always aimed at providing efficient services in a solid relationship with our customers, suppliers and regulatory entities. We maintain constant contact with customers to know their degree of satisfaction and meet their requirements without delay, improving the quality of our customers. **quality of our services.** The information we collect helps us understand where we need to improve in order to adequately respond to our customers' expectations.



## CONFLICTS OF INTEREST



SIPAY acts in favor of business interests with integrity, transparency and honesty, avoiding all types of conflicts of interest.

All SIPAY members must act in the interests of SIPAY, without implying personal interests or conflicting other interests.

**How to recognize a conflict of interest?** A conflict of interest occurs when, for any reason, a reasonable person might wonder whether his or her motivations are in line with the Company's personal interests.

The existence of a conflict of interest may imply that corporate interests are influenced or compromised, especially when the person who incurs this type of situation has decision-making power.

Some common conflict of interest situations can serve as examples:

- ✓ The existence of family or sentimental relationships with other members, or with those of our suppliers or customers.
- ✓ Giving or receiving gifts, tokens of hospitality, or travel.
- ✓ Activities unrelated to the specific function in the Company.
- ✓ Agreements with suppliers or collaborators due to the fact of having hired a family member.

## How to act in the event of a potential conflict of interest?

- ✓ Immediately report any current or potential conflicts of interest to the Compliance Committee before taking any action on them.
- ✓ The Compliance Committee will determine, in the light of the circumstances, the actual existence of a conflict of interest and, where appropriate, the necessary safeguards to preserve the interests of the company.





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# RELATIONSHIP WITH THE MARKET AND PUBLIC ADMINISTRATION

## ANTI-CORRUPTION AND ANTI-MONEY LAUNDERING



SIPAY prohibits the corruption of any person who holds a position in any Public Administration, as well as the payment of bribes or illicit commissions of any kind. SIPAY is committed to complying with the applicable anti-corruption and anti-money laundering laws of all the countries in which it operates. No employee or representative of SIPAY should suffer adverse consequences for refusing a payment of a bribe or kickback, even if it results in the loss of business for SIPAY.

### Anti-Corruption Policy

At SIPAY we declare ourselves **contrary to influencing the will of any person to obtain some benefit through the use of unethical practices**. Similarly, we do not allow other persons, companies, or entities to use such practices with our partners, employees, or collaborators.

Partners, SIPAY members or collaborators may not, directly or through an intermediary, offer or grant, or request or accept unjustified advantages or benefits that have the immediate or intermediate purpose of obtaining a benefit, present or future, for the Company, for themselves or for a third party.

In particular, it is strictly forbidden to receive, offer, promise or conceal any form of bribery, influence peddling, commission or advantage, coming from, or carried out by, any other party involved, such as public officials (Spanish or foreign), personnel of other companies, political parties, authorities, customers and suppliers.

The acceptance or delivery of gifts or gifts must at all times be in accordance with the provisions of the **SIPAY Courtesy and Gift Protocol**, The digital version of which will be permanently available through our corporate website.

If there are any doubts about what is or is not acceptable, you should consult with the Compliance Committee beforehand, who will assist you in determining how to proceed.



## ANTI-CORRUPTION AND ANTI-MONEY LAUNDERING



Please read carefully the most important points of our Anti-Corruption Policy:

- ✓ We do not offer or pay bribes.
- ✓ Transactions must be transparent.
- ✓ Expenses for travel, meals, and accommodations must be adequate and approved in advance; complying with internal regulations on justification of travel expenses.
- ✓ Any expenditure on SIPAY must be accurately recorded in the records and accounting. Expenses shall never be paid without due justification.



- ✓ Gifts and complimentary displays must comply with the provisions of the SIPAY Gift Protocol.
- ✓ Any practice aimed at committing or facilitating the commission of money laundering by third parties is prohibited, as well as any link aimed at the financing of terrorism or the illegal financing of political parties.
- ✓ Report any indication of infringement or suspicion through the Whistleblowing Channel and if you have any doubts, ask the Compliance Committee for advice.



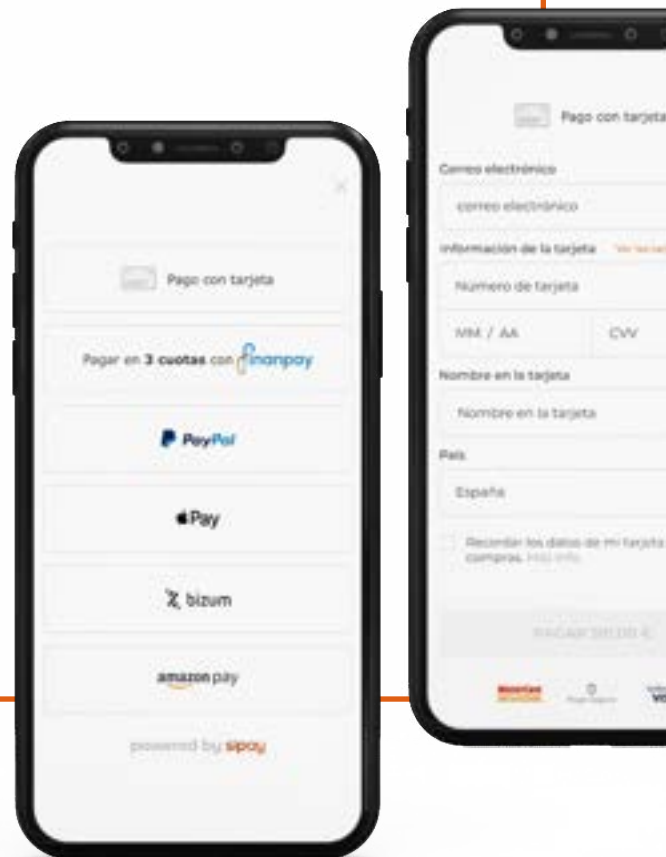
## ANTITRUST AND UNFAIR COMPETITION

SIPAY carries out its activities in compliance with anti-monopoly and unfair competition laws, aimed at promoting healthy competition and prohibiting activities that hinder trade and restrict competition.

Infringement of antitrust and competition legislation may result in financial penalties, both for the Company and for the persons involved. All SIPAY members, workers and collaborators must pay special attention to compliance with the principles governing free competition.

In this sense, they must refrain from carrying out any practice contrary to this principle, such as:

- ✓ Agree on prices with other competing companies;
- ✓ Reveal marketing plans and strategies;
- ✓ report on the cost of goods and services or products, profits, or margins;
- ✓ Inform about the intention to submit bids in public tenders;
- ✓ report on agreements and contracts with suppliers or customers, and,
- ✓ in general, any other practice that could entail an infringement of free competition.





## RELATIONSHIP WITH SUPPLIERS AND COLLABORATORS

In the decision-making, negotiation, signing and contracting processes, SIPAY respects the applicable laws and regulations that govern such relationships, and we expect the same from our suppliers and collaborators.

### Suppliers

SIPAY's suppliers must read and adhere to the rules contained in this Code of Conduct and train their workers in accordance with them; or in accordance with its own Code of Conduct, provided that it contains guidelines for action similar to those set out herein.

### Collaborators

Any person who collaborates commercially with SIPAY must adhere to the rules of this Code of Conduct when selling, distributing or marketing SIPAY services, or acting on behalf of SIPAY; It must also train its staff in accordance with anti-corruption laws and this Code of Conduct; or in accordance with its own Code of Conduct, provided that it contains guidelines for action similar to those set out herein.

No person who collaborates commercially with SIPAY shall pay or offer to pay any bribe, or deliver any valuable goods to a third party for the purpose of obtaining an undue benefit, whether from the public or private sector, with whom SIPAY has any type of business relationship or intends to initiate such a business relationship in the future.







# INFORMATION PROTECTION



The protection of any information that is not in the public domain is a priority objective for SIPAY. This also applies to information relating to SIPAY, its partners, employees, collaborators and third parties, including personal information.

Given that some of SIPAY's activities handle the personal information of minors, an unauthorized or inappropriate disclosure of information can cause significant damage to both the company itself and third parties. Communicating such information may entail a breach of confidentiality commitments assumed by SIPAY vis-à-vis third parties and could also lead to the disclosure of privileged information or non-compliance with personal data protection regulations.

For this reason, the necessary measures must be taken to protect the information and keep it secure, maximizing the protection of sensitive, more critical information or personal data of specially protected categories, analyzing, with care and following the established procedures, any situation in which its communication outside the company is proposed, even in the course of negotiations with a third party.



## IMAGE, CORPORATE REPUTATION AND ADVERTISING

At SIPAY we take care of our corporate image and reputation as an asset of enormous value in guaranteeing the trust of our customers, workers, suppliers, authorities and society in general.

All SIPAY members and employees, as well as employees of supplier and collaborating companies, must take the utmost care to preserve, respect and use SIPAY's corporate image and reputation correctly and appropriately in all their professional activities.

SIPAY members and workers undertake to be especially careful in any public intervention, and must have the authorization of the corresponding department, to intervene before the media, participate in professional conferences, congresses or seminars, and in any other event that may have a public dissemination in which they appear as a member or employee of SIPAY. with the exception that such competencies are included in your job description.



We are aware of the needs of our customers, employees and collaborators and we are committed to responding to them seriously and honestly. Our documentation relating to the advertising, sales and promotion of our services must always be truthful and not contain false or misleading statements.



## CONFIDENTIAL INFORMATION

At SIPAY we respect our ethical and legal responsibilities to protect personal and confidential information, our own and that of third parties, which is only processed to comply with contractual obligations and derived from legitimate interest; in compliance with legal obligations or with the explicit and previously informed consent of the owner of the personal data.

No SIPAY employee, as well as any collaborator, supplier or entity with which SIPAY has a commercial relationship of any kind, shall make use of this information for their own benefit, or use it for purposes other than those related to the data processing activities registered by SIPAY.

All partners, directors, workers, collaborators and suppliers of SIPAY sign their commitment to confidentiality and use of information assets. Confidentiality must be maintained even when the status of partner, worker, collaborator, customer or supplier of SIPAY is lost.

### How to Protect Sensitive Information

- 1 You must comply with the confidentiality agreements to which SIPAY is a party and follow the security policies.
- 2 Don't share sensitive information with anyone, even if they're former co-workers, family, or friends.
- 3 Don't talk about sensitive information in public places.
- 4 Do not work with documents containing sensitive information in public places where third parties may be watching.
- 5 If you discuss confidential information with other co-workers, make sure that it is up to them to know that information.
- 6 Encrypt, as far as possible, the files to be sent attached in emails that contain sensitive information.

## INSIDER INFORMATION



In the course of our activity or through agreements or conversations with our partners, customers or suppliers, SIPAY may have access to important private information about the SIPAY organization or those of third parties.

Some information may be considered vitally important and very sensitive if, as a result of becoming known, there could be the opportunity for third parties to make decisions based on it.

Every precaution must be taken to process information considered privileged by SIPAY or by third parties, avoiding in any case sharing such information with people outside the organization.

Given the complexity of the analysis and the penalties involved in dealing with privileged and/or confidential information, if you have any doubts that this may be occurring, you should contact the Compliance Committee.

At SIPAY we are aware of the advantages in information, socialization and marketing that social networks provide us today. However, we believe it is important to remember that the sensitive, confidential and identifiable information of other natural or legal persons, without their explicit consent, must be protected.

## INFORMACIÓN EN REDES SOCIALES



**We recommend using social media responsibly and judiciously.**



SIPAY regulations governing the rights and protection of the intellectual and industrial property of SIPAY and third parties, including copyrights, trademarks and trade secrets. All contracts entered into by the company must scrupulously follow the rules and procedures in this area to avoid infringing the rights of third parties.

SIPAY owns the property and the rights of use and exploitation of the computer programs and systems, equipment, manuals, videos, projects, studies, reports and other works and rights created, developed, perfected or used by its employees.

SIPAY prohibits any act tending to infringe the industrial and intellectual property rights of third parties.

No SIPAY member is authorized to download software without authorization from the responsible department.

SIPAY promotes and sells third-party brands based on their contractual relationships and with due authorization.

## INTELLECTUAL AND INDUSTRIAL PROPERTY



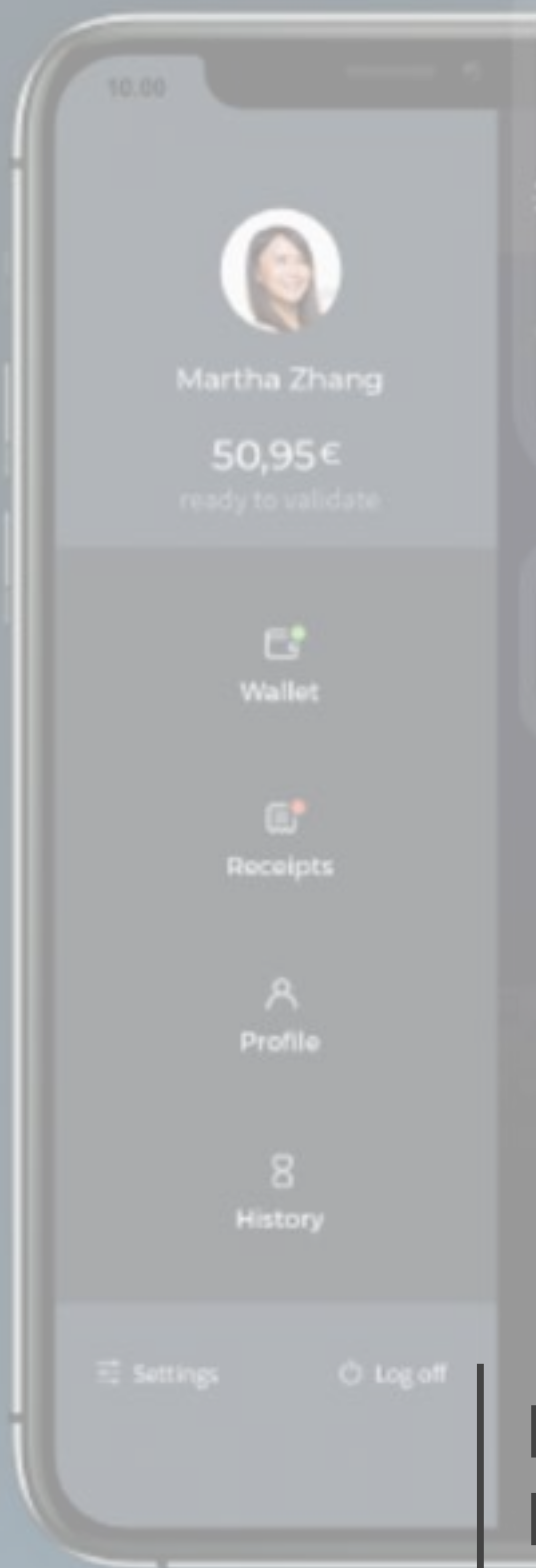
We use software and other content in compliance with the terms and conditions of the licenses associated with them. We prohibit the installation or use of copies of unauthorized copyrighted material, including software, documentation, graphics, photographs, clip art, animations, films or video clips, sounds, and music, unless permitted by applicable law and applicable licenses.



## USE OF EQUIPMENT

SIPAY provides the necessary IT assets so that all workers can carry out their activities efficiently and safely.

SIPAY's partners and employees must protect and make good use of the assets delivered by SIPAY and use them responsibly, efficiently and appropriately, preserving them from any loss, damage, theft or improper use.



Refundable	27,80€
Scanned on Jan 16, 16:52	✓
Scalpers 130,00€	17,64€ refundable
Scanned on Jan 16, 16:52	✓
Flying Tiger Copenhagen 96,80€	10,16€ refundable

Withdrawal via Paypal	-43,00€
01/04/2019	

Withdrawal via bank account	
22/04/2019	

REFUNDABLE

## FINANCIAL AND FISCAL INTEGRITY



## FINANCIAL INTEGRITY

At SIPAY we carry out an effective administration of the company's funds and use them responsibly. We accurately record all commercial information in compliance with local, state and international regulations that are applicable in each case.

Financial transactions are carried out in accordance with management approval and authorization processes and are always correctly recorded in the Company's asset accounting. All staff with financial or payment authorization functions must comply with and ensure compliance with these rules.

- ✓ In any contract to which SIPAY is a party, the agreement must be reflected in its entirety, including the terms and conditions of the negotiation, the resulting terms and all its annexes and supplementary agreements.
- ✓ Under no circumstances will SIPAY allow the change of billing terms that are not consistent with contractual agreements.
- ✓ Whenever there is a standardized agreement in SIPAY through a prior process approved by the management, it must be used, avoiding the use of non-standardized and approved agreements.
- ✓ SIPAY strictly prohibits the manipulation of budgets, billing and agreements for the personal or undue benefit of a third party.





## FISCAL INTEGRITY

SIPAY acts with transparency and truthfulness in the application, management and justification of the subsidies and aid that it may receive from the Public Administrations, whether national or European.

Therefore, it is forbidden to apply on behalf of SIPAY for any kind of subsidy or public aid, falsifying the data, information or conditions for its granting, or falsifying or altering the information necessary for its justification or using it for a purpose other than that for which it was granted.

SIPAY is committed to strict and faithful compliance with the tax and social security obligations that may be applicable to it.

Therefore, it is strictly forbidden to carry out any practice aimed at avoiding payments or obtaining undue benefits to the detriment of the Public Treasury and Social Security, such as the presentation of false, inaccurate or incomplete information and declarations, or the performance of tax operations of an opaque nature, among others.

Likewise, SIPAY is committed to complying with all legal obligations arising from the performance of import and export operations, especially those included in the regulations on the repression of smuggling.





# ENVIRONMENTAL AND SOCIAL SUSTAINABILITY



The commitment to the environment, the retention of talent and the protection of our staff are the utmost in the development of the SIPAY activity

SIPAY is committed to carrying out its activities with the greatest respect for the environment and minimising the negative effects that they may eventually cause.

SIPAY's members and employees are aware of the environmental impact of their activities and are actively and responsibly committed to helping to minimise these impacts.

For this reason, the legal provisions and internal regulations on environmental matters must be complied with at all times, acting with the utmost diligence.

## ENVIRONMENTAL SUSTAINABILITY



## CREATION, PROMOTION AND RETENTION OF TALENT



In a competitive environment such as the one we live in, if SIPAY reaches levels of success it is thanks to the dedication and work of our workers.

For this reason, we seek to have the best specialist professionals, we take care of their constant training and we invest in their potential.

With the same objective, we attract and promote diversity in the work environment, in order to promote collaboration and the personal and professional growth of our work teams.



## EQUAL OPPORTUNITIES AND FAIR TREATMENT

SIPAY is firmly committed to respecting the dignity of its workers and the labour rights recognised in current legislation.

Therefore, all members must act with full respect for the applicable labour regulations and the legally recognised rights in their relations with other workers.

In the processes of selection, hiring and internal promotion of personnel, SIPAY is governed by objective criteria (professional qualification, skills, experience, ethical behaviour, etc.), observing at all times the regulations applicable to recruitment, especially in the case of foreign citizens.

In this regard, any discriminatory practice on the grounds of sex, belief, religion, nationality or any other circumstance is totally prohibited.

Likewise, all members have the obligation to respect and support SIPAY's commitment to equal opportunities and respectful, dignified and fair treatment, fostering a positive, proactive and pleasant work environment.

Therefore, it is categorically forbidden to engage in any offensive, discriminatory, sexual, psychological or moral harassment, abuse of authority, offense or any other form of aggressiveness and hostility that leads to a climate of intimidation or grievance.

SIPAY respects the rights of its employees and contributes to the economic and social life of the countries in which it operates. If SIPAY becomes aware that one of its suppliers or service providers has clandestine workers or that they work under duress or threats, it will reject or immediately cease any relationship with it.



## OCCUPATIONAL HEALTH AND SAFETY

Protecting the health of workers, collaborators and customers in our establishments is a priority.

SIPAY complies with national health and safety standards and ensures that its collaborators and workers do the same.

SIPAY expresses its firm commitment to providing its workers with a safe and healthy working environment, establishing the necessary preventive measures to ensure a risk-free workplace.

Consequently, all SIPAY members, workers and collaborators are obliged to adopt a proactive and responsible attitude in relation to the maintenance of health and safety working conditions and, in particular, they are obliged to:

- ✓ Ensure your own safety, through strict compliance with occupational health and safety regulations.
- ✓ Ensure the safety of their colleagues, promoting the application of these rules among other workers and maintaining an attitude of co-responsibility.
- ✓ Make responsible use of the protective equipment assigned to them.
- ✓ Inform their direct managers of any situation that may pose a risk to the health and safety of workers, as well as the ineffectiveness or inadequacy of the preventive measures applied.



Beyond payments.

## CRIMINAL RISK MANAGEMENT SYSTEM

## CRIMINAL RISK MANAGEMENT SYSTEM

SIPAY has established a Criminal Risk Management System (PRMS) through internal regulations, policies, procedures, protocols and instructions to control knowledge of and compliance with this Code of Conduct, communications of possible breaches and the identification, evaluation and treatment of the different criminal risks that may occur derived from the nature of the activities carried out by SIPAY at any given time.

The Criminal Risk Management System, as well as all SIPAY policies, procedures, instructions, records and protocols are approved and have the firm support of the Administrative Body, the Compliance Body and the approval of the heads of the areas or departments involved.

The Board of Directors, Management and the Compliance Committee are responsible for monitoring compliance with and implementation of the internal rules on which the system is based, as well as for keeping it up to date.

The Compliance Committee is made up of the Directors of Administration and Management, Finance, Human Resources, Communication, Internal Control and external counsel specialising in Compliance.

The Compliance Committee has the functions of ensuring compliance with this Code of Conduct, applying and interpreting SIPAY's internal regulations, managing the reception and investigation of incidents, communicating and raising awareness, collaborating in the design, implementation and application of controls and preventive measures in terms of compliance that minimize the company's risks.

Any questions regarding the interpretation, scope and application of this Code of Conduct should be referred to the Compliance Committee.



### COMPLIANCE COMMITTEE

All SIPAY members, partners, collaborators and other SIPAY stakeholders must read, understand and comply with this Code of Conduct, as well as remember the internal rules and policies that guarantee its achievement to other colleagues.

Likewise, SIPAY personnel must attend to and comply with the procedures and instructions established in the Criminal Risk Management System or other internal regulations that are communicated to them because they affect their job; You must ensure that you complete the supports and records available to demonstrate your effective control.

SIPAY members must share the principles of our company. For this reason, they must express their acceptance of their responsibility by signing their commitment to the provisions of this Code of Conduct.

Any exceptions to the policies set forth in this Code of Conduct and the rules derived from it, provided that they do not conflict with the legal system in force, must have the prior written authorization of the Compliance Committee.

In order to make this Code of Conduct known to all interested parties, the procedures of the Criminal Risk Management System and the mechanisms for communicating its content are established. This Code is made available to anyone interested on the SIPAY website and will also be referenced in all contracts with any interested party.

## COMPLIANCE WITH CODE OF CONDUCT





Any employee, collaborator, customer, supplier or any interested party of SIPAY who considers that, for any reason, conduct may be being carried out that could involve an action or omission that constitutes an infringement of European Union law (legal breach), or that may constitute a serious or very serious criminal or administrative offence; as well as conduct contrary to the Criminal Risk Prevention Policy, this Code of Conduct or the rest of SIPAY's regulations, must be reported immediately and directly through the whistleblowing channel available on the corporate website established for this purpose and managed by the Compliance Committee advised by an independent third-party expert in guaranteeing the obligation of confidentiality.

SIPAY guarantees the anonymity and confidential treatment of any communication received through the Whistleblowing Channel.

Likewise, any type of retaliation against anyone who, in good faith, makes a communication for conduct that could violate this Code is expressly prohibited, regardless of the result of the investigation of the facts reported or denounced.

All SIPAY partners, employees and collaborators must cooperate in internal investigations into compliance and ethics issues. We believe that establishing communication channels without fear of negative consequences is vital for the proper implementation of our Criminal Risk Management System.

## WHISTLEBLOWING CHANNEL



## SANCTIONING REGIME

The people who are part of SIPAY must comply with the principles of this Code of Conduct and other internal rules of the Criminal Risk Management System. Failure to comply with the provisions of the agreement will be considered a misdemeanour and the person involved may be sanctioned in accordance with the applicable Labour Agreement and other applicable provisions.

In the case of franchisees, collaborators and suppliers (whether natural or legal persons) and for contracts through external agencies, this Code will be applied to the extent that it is not complied with, and failure to comply with it may result in the termination of the contract or any type of relationship with SIPAY.

# APPROVAL, VALIDITY AND REVISION OF THE CODE OF CONDUCT

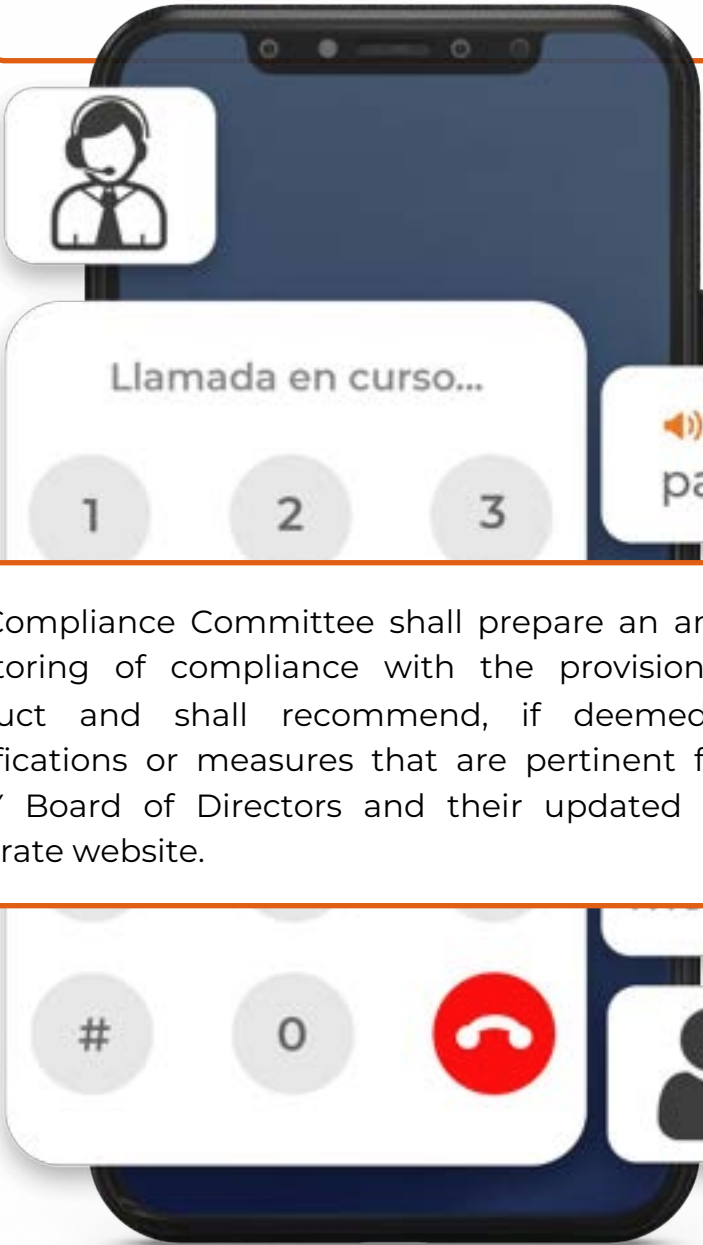


# APPROVAL & VALIDITY



The Code of Conduct is approved by the Board of Directors of SIPAY and, by adhesion by that of the companies of the SIPAY Group, and has an indefinite duration.

However, it will be reviewed and updated periodically by the Compliance Committee, taking into account the contributions received from SIPAY members or that interested parties may transmit to them, as well as potential new risks arising from the life and activity of the Company.



# REVISION



The Compliance Committee shall prepare an annual report on the monitoring of compliance with the provisions of this Code of Conduct and shall recommend, if deemed appropriate, the modifications or measures that are pertinent for approval by the SIPAY Board of Directors and their updated publication on the corporate website.



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