



# BUSINESS CONDUCT AND ETHICS POLICY

Rev.: 00  
Fecha: 05/02/2020

The Management of DESARROLLO DE SISTEMAS AVANZADOS S.L through this policy, communicates its commitment to this Code of Ethics and Conduct, which involves compliance with legal provisions, disciplinary, contractual and regulatory authorities and the organization.

This Code sets the guidelines for establishing high standards of behaviour based on the ethics and values of Advanced Systems Development (ASD) and all its employees. However, this code goes beyond the legal minimums, describing the ethical values we share as DSA members.

The most important aspects under which our social policy is governed are

- **NO corruption:** In our business relations, in dealing with our customers, as well as with our suppliers and institutions, our company has always known how to keep strictly separate, the interests of the company itself and the private interests of the people who work in it. All actions and decisions taken have been made according to purely commercial interests.

It is not permitted to donate, offer or guarantee privileged positions in the company in exchange for commercial or business relationships, either by the company or by any of its employees, not being understood as such the presents or general invitations of courtesy and hospitality that usually appear as part of certain usual commercial actions.

- **Rejection of unfair competition:** Our company is committed to ensuring compliance with the provisions against unfair competition.
- **Forced Labour:** Our company has rejected, rejects and will always reject completely and absolutely any form of forced labour.
- **Non-employment of minors:** The employment of persons below the minimum age of employment as set out in the relevant regulations and United Nations rules are completely prohibited as a matter of policy.
- **Respect for Human Rights:** Our company respects and supports the fulfilment of the internationally recognized, "Human Rights".
- **Non-discrimination:** DSA is committed, within the framework of the equality law and in application of the workers' statute, to the rejection of all forms of discrimination. In particular, discrimination on the basis of gender, race, disability, age, sexual orientation and/or ethical or religious thought.
- **Health protection:** The company guarantees the protection of workers in their workplace within the scope of national provisions. In addition, it supports and ensures continuous improvement in worker protection and the working environment.



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- **Working conditions:** The company respects the rights of its employees, protected by the law and the workers' statute.
- **Data protection:** In accordance with Organic Law 15/1999 of 13 December on the Protection of Personal Data, it is forbidden to disclose confidential company information to third parties, or to provide access to such information without the express authorisation of the management.

## COMPLIANCE AND MONITORING OF THIS CODE

Any breach or failure to comply with the rules and ethical principles on which this Code is based must be reported through the established communication channels to the Human Resources Management, which undertakes to carry out the appropriate investigation of the case.

The infringement or non-compliance will result in sanctions that will be applied according to their severity, starting with a verbal warning and ending with the termination of the employment relationship.

All censures and warnings will be made privately and with the aim of correcting the conduct detected, leaving a record of their formulation in the employee's personal file. However, if it is determined that the censored conduct is a cause for justified dismissal under current legislation, DSA will proceed to do so through the Human Resources Department, after consulting with the Legal Department. If the censured conduct further criminalizes any of the offences provided for in the legislation, DSA will act in accordance with the applicable legal procedures.

Manuel Arce Rodríguez  
DSA Administrator