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1.- OBJECTIVE

The finality of the Code of Ethics of Suris is to establish the guidelines that must govern the ethical behaviour of all of its directors and employees, as regards the relations and interactions that it has with all of its groups of interest. These groups are the employees themselves, clients, suppliers and external collaborators, shareholders, public and private institutions and society in general.

This Code of Ethics constitutes a guide for action to ensure suitable behaviour in the professional performance of its employees, in accordance both with the laws of each one of the countries in which Suris performs its activities and with the established Regulatory System, respecting the values of their respective cultures.

The Code reflects the principle of diligence applied by Suris for the prevention, detection and eradication of irregularities related to breaches of the Code and of established internal rules.

The company understands that diligence in these subject areas requires, among other things, designing and implementing control models that may regularly analyse risks in the affairs covered in this Code, ensure knowledge of rules in the organization, define responsibilities and establish procedures that may allow for the confidential notification of irregularities and the resolution of the same.

2.- SCOPE OF APPLICATION

The Code of Ethics of Suris is addressed towards its directors, executives, and, in general, all of the personnel of the company, irrespective of the positions that they hold or the place where they perform their work. It is mandatory to comply with the guidelines for behaviour contained in this Code and they affect all companies in which Suris has invested in which it has management control.

It is expected that suppliers and sub-contractors will apply equivalent standards.

3.- GOVERNING PRINCIPLES OF ETHICAL CONDUCT

Suris considers that the trust of its shareholders, clients, suppliers and external collaborators, as well as the social environment in which it performs its activity, are based on **integrity and responsibility** in the professional performance of each one of its employees.

Integrity is understood to be actions taken in an ethical and honest manner in good faith. Professional responsibility is understood to be proactive, efficient action focused on excellence, quality and the desire to provide a service. Suris expects all of its employees to conduct themselves with integrity and responsibility in the performance of their functions.

4.- GUIDELINES OF CONDUCT

The Code of Ethics determines specific guidelines for action in the following areas:

4.1. Respect for legality, human rights and ethical values.

All employees must comply with laws in force in the countries where they perform their activity, attending to the spirit and finality of the same, and observing ethical behaviour in all their actions.

In addition, they must avoid any conduct which, even when not breaching law, may damage the reputation of the company as towards the community, the government of the country or other bodies and have a negative effect on its interests.

The employees of Suris must act with honesty and integrity in all of their contacts or transactions with the authorities and public workers of the various different governments and administrations, ensuring that all information and certifications that they present, as well as any statements that they make, are truthful.

All employees must know the laws that affect their work, requesting, where appropriate, any necessary information, via their superior or by means of any appropriate forms of request.

No employees are to consciously collaborate with any third parties in breach of any law, and neither may they participate in any actions that may compromise the respect for the principle of legality. For its part, the company shall provide the means necessary for its employees to know, at all times, relevant external and internal regulations for the functions that they may perform, and it will establish necessary internal control models to ensure compliance with legality and ethical values. In any situations of lack of respect for legality, human rights or ethical values, employees must inform the company via their hierarchical superior.

4.2. Respect for persons.

Suris rejects any form of physical, psychological or moral harassment or abuse of authority, as well as any other conduct that may generate an intimidating or offensive environment as regards the rights of persons.

Employees must treat each other with respect, facilitating cordial relations and a pleasant, healthy and safe working environment. All employees are under the obligation to treat their colleagues, superiors and subordinates in a fair and respectful manner.

4.3. Professional development and equal opportunities.

Suris promotes the professional and personal development of all of its employees, ensuring equal opportunities via its policies of action. It does not accept any type of discrimination in the employment or professional environment due to reasons of age, race, colour, sex, religion, political opinion, national ascendancy, social origin or disability.

4.4. Cooperation and dedication.

Suris promotes an environment of cooperation and teamwork to take greater advantage of all capacities and resources. All employees must act with a spirit of collaboration, making any knowledge or resources that may facilitate the achievement of the objectives and interests of the company available to the other organizational units and persons that form the group.

Employees must work efficiently during working hours, make profitable use of the time and resources that the company makes available to them, and endeavour to provide the greatest value possible in all processes in which they participate.

4.5. Occupational health and safety.

Suris promotes the adoption of occupational health and safety policies and adopts the measures of prevention established in the legislation in force in each country, and ensures compliance with regulations in this area at all times.

In addition, it promotes and encourages the application of its health and safety rules and policies by collaborator companies and suppliers that it operates with.

4.6. Use and protection of assets.

Suris provides its employees with the resources necessary for the performance of their professional activity, and undertakes to provide means for the protection and safeguarding of the same.

All employees must use the resources of the company in a responsible, efficient and suitable manner in the environment of their professional activity. In addition, they must protect and preserve them from any inappropriate use from which any damages for the interests of the company may be derived.

The company does not permit the use of the equipment that it makes available to its employees for any computer programs or applications the use of which may be illegal, or which may damage its image or reputation, or to access, download or distribute any illegal or offensive contents.

4.7. Corruption and bribery.

Corruption and bribery appear whenever employees use non-ethical practices to obtain any benefit for the company or for themselves. Corruption and bribery are one of the categories of fraud.

Suris declares that it is against influencing the wishes of any persons outside the company in order to obtain any benefit by means of the use of non-ethical practices. It will not permit any other persons or entities to use such practices with its employees, either.

The employees of the group may not directly or indirectly accept any gifts or compensations or any type the aim of which may be to have an inappropriate influence on their commercial, professional or administrative relations, with either public or private entities.

In addition, employees may not, directly or indirectly, make any payments or give any gifts or compensations of any type that may not be considered inherent to the normal course of business, in order

to attempt to have an inappropriate influence on their commercial, professional or administrative relations, with either public or private entities.

4.8. Irregular payments and money laundering.

Suris establishes policies to prevent and avoid the making of irregular payments or money laundering originating from illicit or criminal activities during its operations.

4.9. Corporate image and reputation.

Suris considers its image and reputation to be one of its most valuable assets to preserve the trust of its shareholders, clients, employees, and suppliers, as well as authorities, and society in general.

All employees must take the utmost care to preserve the image and reputation of the company in all their professional actions.

Likewise, they are to ensure correct and appropriate use of the image and reputation of the company by the employees of contractor and collaborator companies.

Employees must be especially careful in any public interventions, having to be in possession of the authorization necessary to intervene before any means of communication, participate in professional day courses or seminars and in any other events that may be broadcast publicly (including comments in social networks), whenever they may appear as employees of SURIS.

4.10. Loyalty to the company and conflicts of interest.

During the performance of their professional responsibilities, employees must act with loyalty and attending to the defence of the interests of the company. In addition, they must avoid any situations that may give rise to a conflict between personal interests and those of the company.

4.11. Treatment of information and knowledge.

Suris considers information and knowledge to be one of its main assets and essential for business management, due to which they must be subject to special protection.

All of the employees of the group must maintain the strictest confidentiality in relation to any restricted information that they may access as a consequence of the performance of their professional activity.

Any employees who introduce any type of information into the computer systems of the group must ensure that this is accurate and trustworthy.

Suris complies with legislation in force in the area of data protection, respecting the right to privacy and protecting the personal data entrusted to it by its clients, employees, suppliers and external collaborators, candidates in recruitment processes, or any other persons.

Employees are to protect the intellectual property of the company, which, among others, includes rights over patents, marks, domain names, rights of reproduction (including rights of reproduction of software), rights over designs, of extraction from databases or over specialized technical know-how. In their relations

with third parties, employees must follow the rules and procedures in this subject area scrupulously in order to avoid breaching the rights of any third parties.

4.12. Relations with clients.

All of the employees of Suris must act in an honest and trustworthy manner with the clients of the company, with the aim of achieving the highest levels of quality, excellence in the rendering of the service and long-term development of relations based on trust and mutual respect.

4.13. Relations with shareholders.

The goal of SURIS is the continual creation of value for its shareholders, due to which it undertakes to provide objective, transparent, suitable and appropriate information on the evolution of the company and under conditions of equality for all of its shareholders.

4.14. Relations with collaborator companies and suppliers.

Suris considers its suppliers and collaborator companies to be an essential party for the achievement of its objectives of growth and improvement of the quality of service, and seeks to establish relations with them based on trust and mutual benefit.

All of the employees of the company who participate in processes of selection of suppliers and external collaborators are under the obligation to act impartially and objectively, applying transparent criteria and complying strictly, without exception, with internal regulations.

4.15. Respect for the environment.

The preservation of the environment is one of the basic principles of action of Suris. Consequentially, it has defined a policy and implemented an environmental management system.

Employees must know and assume said policy and act, at all times, in accordance with the criteria of respect and sustainability that it inspires, adopt habits and conduct related to good environmental practices and contribute positively and effectively to the achievement of the objectives established.

5.- ACCEPTANCE AND COMPLIANCE WITH THE CODE

It is mandatory for all of the employees of Suris, and for any third parties who may have voluntarily undertaken to comply with to comply with this Code of Ethics, to comply with the same.

The company is to communicate and distribute the content of this Code of Ethics among all of its employees and among any third parties for whom this may prove to be relevant. Employees must formally undertake to comply with the Code the moment when they begin working in the company, upon novation of their contracts, and in any other circumstances in which the company may deem this to be convenient.

Suris expects a high level of commitment towards compliance with its Code of Ethics from all employees, and all employees may be evaluated on the basis of compliance with this Code. Non-fulfilment thereof will

be analysed in accordance with internal procedures, legal regulations and collective agreements in force, and, where applicable, any appropriate penalties shall be applied.

6.- VALIDITY

The Code of Ethics shall come into force on the day of its publication. It shall be reviewed and updated periodically by the Management Committee.

THE MANAGEMENT COMMITTEE

In Barcelona, on 15 February 2017