

# Ethic code

Version 2020



## Presentation

The Ethic Code is our guide to proper conduct, together with the established work rules and procedures, to guarantee what is correct and that in its logical consequence no crime occurs in the company.

SUBMER TECHNOLOGIES, S.L. (hereinafter Submer) is a modern, technological and innovative company that operates globally, with linked people from many different nationalities.

Submer thinks big in every way and also in an ethical sense, wanting to be consciously, proactively and maturely committed to improving the planet and people's lives and, of course, respecting human rights and civil liberties.

The Ethic Code also constitutes an action guide to ensure proper behaviours of the staff and collaborators, defining the vision, values and principles of Submer.

For the purposes of this Ethic Code, Submer's staff are considered to be the administration, management and staff of all the Group companies, as well as those other people whose activity is expressly subject to the Code of Ethics.

For the purposes of this Ethic Code, Submer collaborators will be considered partners, suppliers and customers and any other persons or companies with whom Submer has strategic, business, commercial or legal relationships.

Compliance with the Ethic Code is understood without prejudice to strict compliance with the corporate governance system that the company has implemented internally.

## The purpose of the Ethic code

This Submer's Ethic code is intended to establish the ethical criteria and guidelines for responsible action that steer and inspire us as we carry out our roles. It is an essential element of Submer's corporate culture, and a fundamental pillar upon which we build our relationships with our groups of interest.

This Code is a crucial tool for promoting and applying our values and culture, which are based on respect and the observance of human, social and labour rights.

## Values

Our values represent our identity as a collective. We are different because the people who work at Submer make this company a unique and differentiating project. We are fast, we know how to listen, we seek innovation, we are helpful, and we work as a team in a rigorous and transparent way.

At Submer we listen carefully to our internal and external clients to know exactly their needs and propose suitable solutions.

Our attitude is always open and respectful of the opinion of all parties involved in the situation.

We constantly update our technological knowledge to become pioneers in innovation.

We serve our clients efficiently, maintaining at all times an agile and decisive behaviour that enhances the credibility and reputation of the company and its professionals.

We know how to work in multidisciplinary teams, from different units, companies and countries, generating a climate of trust and mutual respect.

We respect differences, opinions, and diversity.

We are respectful of the environment and sustainability policies.

## To whom it applies and accomplishment

The code of ethics applies to the company's internal collaborators, regardless of their hierarchical level, their geographical or functional location and the group company in which they provide their services, and to external collaborators who maintain some type of relationship with Submer, regardless of the type of business relationship established (directly or indirectly).

This code is mandatory for everyone.

It is our responsibility to understand the content contained herein and to observe and comply with its principles, guidelines, and procedures as we perform our daily work at, with and for Submer.

Submer commits to communicating the content of this Code in a clear and transparent manner and will ensure that every person to whom it applies knows and understands it.

In turn, those to whom this Code applies are obliged to inform Submer of any irregularities of which they may be aware and which, in their own judgment, could violate or breach the principles and rules contained within this Code.

Breaching this Code may lead to legal liabilities of different natures (for instance, labour, civil, administrative and even criminal, depending on the nature and severity of the infraction), as is established in the current law and other applicable internal regulations. With regard to our suppliers, breaching this Code may lead to the termination of the relationship, agreement and/or contract that binds the supplier to Submer, without prejudice to any other legal liability that may correspond according to the applicable law. Regarding our employees, breaching this Code may lead to disciplinary measures, depending on the applicable disciplinary regime.

## Principles

The ethical behaviour that governs this society is based mainly on the following principles:

### GOOD FAITH

We adjust our actions at all times to the principles of loyalty and good faith with the company, with superiors, colleagues and collaborators with whom we interact. We emphasize the desire to achieve and the spirit of improvement. The concern to achieve the objectives set must be constant and continuous. We promote optimistic versus pessimistic attitudes. We subordinate personal objectives to the general ones of the Company. We ensure that there is no conflict between the two, and we act giving priority to the interests of the company over personal interests or those of third parties.

### HONESTY

All Submer employees undertake to declare any personal or professional relationship that could condition our behaviour as employees of the Company. Furthermore, as Submer employees we do not accept improper compensation or advantages. We promote honesty and professional ethics in the usual business and professional relationships in the performance of our work, both in the private sector and in our relationships with Public Administrations. We do not offer gifts, nor do we promise undue favourable treatment to third parties, whether public or private, in order to obtain an advantage. We promote trust to declare gifts or advantages that we may obtain from third parties and make them available to the company. Any personal or professional relationship that affects the interests of the Company is communicated to the immediate boss.

We avoid conducts contrary to free competition, or that suppose an act of unfair competition. In advertising campaigns we offer information clearly and truthfully.

## RESPECT

Each and every one of us is responsible for generating an atmosphere of cordiality and kindness in our environment. We promote respect and trust between people. We value diversity in opinions, training and culture as a source of knowledge and competitive advantage. We take care of the language we use when speaking of third parties and we encourage the non-existence of defamatory comments and guidelines inside and outside the organization. We promote respect for real equal opportunities between men and women, avoiding any scenario of direct or indirect discrimination. No person employed in Submer discriminated in the professional sphere because of race, physical disability, religion, age, nationality, sexual orientation, sex, political opinion or social origin. We maintain a work environment free from all discrimination and any conduct that implies harassment of a personal nature, not admitting any form of physical, sexual, psychological or verbal harassment or abuse. We respect the environment and collaborate with the sustainable development of society.

## CONFIDENTIALITY

We refrain from providing, internally or externally, confidential data about people and / or activities carried out in the Company. However, we do provide the data that is necessary for other Submer employees to correctly perform their duties, with strict respect for this duty of confidentiality. We avoid conduct that is contrary to free competition, or that represents an act of unfair competition. In advertising campaigns we offer information clearly and truthfully. Principles of ethical behaviour, respect, confidentiality and use of information. We comply with the regulations for the protection of personal data in relation to which we have access due to our job position. Submer employees. We are characterized by a marked proactive attitude in the treatment of confidential information. The information is the property of the Company and should be shared whenever it is beneficial and necessary for it. In our conduct:

We provide those responsible for accurate, necessary, complete and timely information about the progress of the activities in our area; and to our colleagues, the one that is necessary for the proper performance of their duties.

We maintain the professional secrecy of the data, reports, accounts, balances, strategic plans and other activities of Submer and its people, which are not of a public nature, and whose publicity may affect the interests of the company. We will not provide information about these, except when we are expressly authorized to do so.

We obtain information from third parties in an ethical and legitimate way, rejecting all information obtained improperly or that involves a violation of company secrecy or its confidentiality.

In the event of having doubts about the appropriate treatment of the information, we request the assessment of our manager about the correct cataloguing of this.

We will not be able to use for our own purposes, those of third parties, or to obtain profit or profit, the programs, computer systems, manuals, videos, courses, studies, reports, etc., created, developed or perfected in

Submer and its collaborators must be guided by respect for the general principles of this code and compliance with current legislation in each country in which we carry out our activity.

# Commitments

## EMPLOYEES AND COLLABORATORS

No employee of Submer can be subject to discrimination on the grounds of race, gender, sexual orientation, age, nationality, religious beliefs, political opinions, social background, physical or mental disabilities, or any personal or social situations.

We promote relationships that are based on dignity, participation and collaboration of people, while taking cultural diversity into account. Therefore, at Submer we will not tolerate any form of physical, sexual, psychological or moral harassment or abuse, nor any other behaviours, attitudes or comments that intimidate or offend others or that could create an intimidating or hostile work environment.

We make it our priority to ensure that we all operate in workplaces that are healthy and safe, which means that we comply with prevention measures, health and safety regulations and are continuously striving to improve working conditions.

We advocate and promote compliance with human and labour rights, and therefore we commit to strict compliance with labour regulations and to promoting the prevention, detection and elimination of any irregularities in this regard.

## CLIENTS

We are committed to offering to our clients a product that respects high standards for quality, health and safety, while guaranteeing that none of our items pose any risks to health and/or safety while in use.

Our relationship with our customers is based on criteria related to consideration, respect and dignity, taking into account the cultural sensitivity of each individual. We do not tolerate any discriminatory treatment in terms of race, religion, age, nationality, gender, sexual orientation or any other personal or social situation, as is prohibited by law.

We commit to communicating with our customers in a clear and transparent manner, promoting our products and services on the basis of objective standards, without falsifying their terms or characteristics. We take care to ensure that our promotional activities are carried out in a clear manner, with the aim guaranteeing that we do not provide false or deceitful information, or information which could mislead our customers or third parties.

## SUPPLIERS

We interact with our suppliers in a way that is lawful, ethical and respectful, and we also work closely with them to ensure that they comply correctly with this Code.

The selection of our suppliers is performed in accordance with objectivity and transparency criteria, and combines our interest in obtaining the best terms with the convenience of having stable relationships with ethical and responsible suppliers. During selection, we pay particular attention to the rules and processes related to certification, tendering, inspection and verification, to which our suppliers must comply.

We strive to ensure that all suppliers working with Submer commit to respecting the human and labour rights of all their employees, and applying and conveying these principles to their business partners.

At Submer we strive to reduce our environmental impact. Therefore, suppliers must continuously work with environmental improvement measures and be aware of the environmental impact of their operations. The supplier must carry out active environmental work and, whenever possible, purchase goods and services that protect and respect the environment.

Submer verifies, obtaining data from the relevant authorities, that the supplier is complying with the legal requirements regarding its payment of taxes and contributions to Social Security. The supplier must provide Submer with all the information necessary to perform such validation.

The supplier must have the economic stability and financial position necessary to be able to carry out its activity without any risk of interruption due to financial problems. That is why in Submer we will validate the solvency of the suppliers. All suppliers must provide information in English if we request it in Submer.

As Submer employees or collaborators, we cannot offer, promise, grant, request, receive or accept, either directly or indirectly, any presents, gifts or donations, benefits, advantages, favours or compensations, either in cash or in kind, regardless of their nature, to or from a physical or legal person with whom Submer has a relationship of any kind.

## COMPETITORS

Submer is committed to competing in the markets fairly and will not make misleading or denigrating advertising of its competition or third parties.

Obtaining information from third parties, including competitive information, will be inexcusably done legally.

Free competition will be promoted for the benefit of citizens

### ADMINISTRATIONS AND PUBLIC INSTITUTIONS

We interact with administrations, public institutions and other authorities in a way that is lawful, ethical, respectful and aligned with the international provisions in place for the prevention of corruption and bribery.

At Submer we comply with our tax and Social Security obligations. Furthermore, we ensure that any subsidies requested or granted by public administrations are put to good use and that requests are transparent, thereby preventing the falsification of the terms of securing said subsidies or the possibility of using them for purposes other than those intended.

We commit to collaborating with public administrations in the event that the company is involved in an inspection procedure.

### CONFLICT OF INTERESTS

We commit to preventing any real or potential situation that may cause a conflict between our personal interests and those of Submer. We must refrain from representing Submer in personal matters and from intervening in or influencing any decisions made by Submer in which we have a personal or familial interest, directly or indirectly. We must refrain from using our position within the company to obtain assets or personal advantages, or to benefit as individuals from business opportunities.

### EXTERNAL ACTIVITIES

Everyone who works at Submer has the freedom to engage in diverse activities outside of their working hours, and their private lives and political freedoms are completely respected. However, at Submer we always encourage our people to ensure that said activities respect the values and principles that have inspired this Code.

Our business model does not interfere with the political situation of the communities where we develop our manufacturing, distribution and/or sales operations. Any relationships with governments, authorities, institutions and political parties are based on respect of the principles of legality and neutrality. If any contributions, monetary and/or in-kind, are made to political parties, institutions or public authorities, they will always comply with the current laws and ensure transparency; for this purpose they will be preceded by a mandatory report that confirms total compliance with the law.

### USE OF SUBMER ASSETS, SERVICES AND SYSTEMS

We commit to making efficient use of the services, assets, equipment and systems that Submer puts at our disposal for the execution of our duties, and using them according to the internal rules, while always refraining from making use of them for illicit purposes or for our own personal benefit.

At Submer we are digital, which means that we are particularly concerned with protecting the security of Submer's information systems. To achieve this, we must not share passwords, attempt to modify or alter security elements, or install or use applications which are illegal or may harm the assets or information systems of Submer.

These principles and usage criteria also apply and are binding for our suppliers with regard to the goods, equipment and systems that we put at their disposal within the context of our relationship.

### INFORMATION PROCESSING AND PERSONAL DATA PROTECTION

We consider information to be one of our main assets, which means that it must be subject to special protection. We declare the truthfulness of information as a basic principle of all our actions, which means that any information entered into our systems must be true, accurate and reliable. Furthermore, as an organisation we are cognisant of the security and confidentiality of information and the protection of personal data, and we make it a priority to comply with the current laws regarding security and the protection of personal data.

We commit to maintaining confidentiality and using any data, information or documents obtained through our work at Submer, appropriately and in accordance with the law. We are also obliged to protect the information and knowledge generated within the organisation, or that which the organisation owns or is safeguarding.

We commit to respecting the privacy and personal and familial intimacy of everyone whose data we have access to, whether they are employees, customers, suppliers or otherwise. Data usage authorisations must respond to specific and justified requests. It is our duty to strictly obey the internal and external rules that have been established to ensure that information and data provided by third parties are processed appropriately.

Submer, both in relations with its staff and collaborators, as well as in the development of its activity in general, complies with and will comply with the European standards for the protection of personal data, contained in Regulation (EU) 2016/679 of the Parliament. and of the Council, of April 27, 2016, regarding the protection of natural persons with respect to the treatment and free circulation of personal data.

## PROTECTION AND DEFENCE OF INDUSTRIAL AND INTELLECTUAL PROPERTY

At Submer we are committed to respecting, protecting and defending our own industrial and intellectual property and that of third parties. This includes identifying signs such as trademarks, commercial names, industrial designs, copyrights, domain names, utility models, inventions and software, among others.

With regard to our marketing and advertising campaigns, we only use trademarks, identifying signs, images, graphics, text, illustrations and other materials for which our use has been duly authorised by the Communication and Marketing Department in accordance with regulations and internal procedures as well as the principles of this Code.

## FINANCIAL CONTROL

At Submer we record all economic and financial transactions with clarity and accuracy in the corresponding accounting books, in a way that represents said transactions accurately. This includes entering financial information into the company's systems in a clear, complete and precise manner.

We commit to implement and maintain an adequate system for the internal monitoring of financial and accounting information, and to ensure the rigour and integrity of our financial information, which, in accordance with the applicable law, must be published for the market or entered onto the corresponding records.

## OUR SOCIAL AND ENVIRONMENTAL COMMITMENT

Our social and environmental commitment during the development of our activities and for the benefit of our interest groups is a fundamental part of our business model in every community in which we are present.

We are committed to minimising the environmental impact throughout the lifecycle of our products, and to this end we develop, in every stage of the design, manufacturing, distribution, sale and end of use processes of said products, the necessary reduction and compensation measures.

As we develop our activities as Submer employees and collaborators, we promote social and environmental sustainability as a means to create value with all our interest groups.

## Communication and enquiries

Any communications related to the interpretation or application of this Code, or to claims of irregularities or breaches of this Code may be sent to Submer through the following means:

- Enquiries about the interpretation or application of the Code: by post (to Calle de la Metal-lúrgia, 49, 08908 L'Hospitalet de Llobregat, Barcelona, for the attention of the Ethics Committee) or by email to the Ethics Committee ([codigoetico@Submer.com](mailto:codigoetico@Submer.com)).
- Whistleblower channel: by post (to Calle de la Metal-lúrgia, 49, 08908 L'Hospitalet de Llobregat, Barcelona, for the attention of the Whistleblower channel) or by email to Submer's whistleblower channel ([integrity@Submer.com](mailto:integrity@Submer.com)).

The Code of Ethics, by its nature, does not cover all possible situations but rather establishes the general criteria to guide the conduct of Submer's staff and, where appropriate, resolve any doubts that may arise in the development of their work activity.

Any doubts that may arise for the staff regarding the interpretation of the Code of Ethics should be consulted with the immediate hierarchical superior or, if circumstances require it, the Human Resources department may be contacted.