

The logo for comocom, featuring the word "comocom" in a lowercase, sans-serif font. The letter "o" in the middle is colored red, while the other letters are dark blue.

comocom

CODE OF ETHICS AND CONDUCT

Contents

1.	Introduction	3
	What is the Code of Ethics and Conduct?	3
	To whom does the Code of Ethics and Conduct apply?	3
	Our Corporate Values.....	3
2.	Our Commitment to our Employees	4
	We respect the rights of employees	4
	We provide safe working conditions	4
3.	How we behave	5
	We do not offer or take bribes, and we avoid any corruption practice..	5
	We Protect Data and Confidential Information.	5
	Protection and Ownership of Assets	5
4.	How do we behave with our stakeholders.....	6
	We Treat Our stakeholders fairly.....	6
	We Compete Fairly	6
5.	We Are Committed to Human Rights.....	7
6.	What are conflicts of interest and how do we handle.....	8
	What are conflicts of interest?	8
	How to know if we are facing a conflict of interest?	8
	How do we handle conflicts of interest?	9
	Where can I report behavior that violates this code of ethics?.....	9
7.	Legal Compliance	10
	Administration of the Code of Ethics and Conduct.....	10
	Non-Compliance.....	10

1. Introduction

What is the Code of Ethics and Conduct?

The Code of Ethics and Conduct is a guide for behaviors that complements our judicious and common-sense criteria, to help us adopt behaviors that make us proud and that promote the maintenance of the positive image of comocom.

This code leads us to promote the generation of value in a responsible way.

To whom does the Code of Ethics and Conduct apply?

To all comocom Collaborators, who must comply with the guidelines established in this code, regardless of the country where we are.

Likewise, its Suppliers must comply with this Code and it is expected that its Clients and strategic Allies make determined contributions to the strengthening of the ethical culture, in compliance with the relevant aspects of this Code.

Our Corporate Values

Customer Satisfaction: Put customer satisfaction first

Customer Empathy: Create and offer services you believe in

User Experience: Emphasize always on design and ergonomic

Engagement: Be passionate about your work

Goal Orientation: Begin with the end in mind

2. Our Commitment to our Employees

We respect the rights of employees

Our labor practices are aimed at allowing comocom employees to work freely and in conditions of safety and dignity.

Every day we work to achieve this goal, for this reason we treat all employees with respect and dignity in their workplace and provide them with an environment free of discrimination based on race, nationality, sex, religion, creed, age, political affiliation, origin, social class, physical appearance, physical or health limitations.

We provide safe working conditions

We are committed to providing workplaces and operations safe that guarantee the health and safety of all those who work or visit our headquarters.

3. How we behave

We do not offer or take bribes, and we avoid any corruption practice.

We do not offer or promise, directly or through intermediaries, any kind of bribery.

We do not accept any kind of favor offered to us by a third in order to obtain some preferential treatment.

We do not carry out any activity that can be understood to be aimed at paying or receiving bribes.

We Protect Data and Confidential Information.

We do not share confidential information with anyone unless there is a valid business reason for you to have it and you sign a nondisclosure or a confidentiality agreement with comocom.

Our responsibility to securely protect confidential information continues even after a project or business relationship has ended.

We always comply with applicable laws designed to protect confidential information.

Protection and Ownership of Assets

This applies to resources both in the form of tangible assets and intangible assets such as computer systems, bespoke processes, software, intellectual property, trade secrets and confidential information.

These resources shall not be used for any other purpose than for comocom or their Clients' business. They shall not be used for unauthorized or unlawful purposes or for personal gain.

We Communicate Responsibly

comocom presents its image to the public through official company communications, which is why our statements are always transparent and accurate.

4. How do we behave with our stakeholders

We Treat Our stakeholders fairly

We care about how our decisions affect our customers, colleagues, suppliers and society in general.

We are aware of our role in supporting the financial stability and long-term sustainable growth of the societies in which we operate.

We Compete Fairly

We do not participate in any type of agreement with competitors that violates free competition. We do not discuss matters related to costs, prices, markets, territories, distribution systems or similar with our competitors.

5. We Are Committed to Human Rights

comocom is committed to responsible corporate practices in the area of human rights contained in the international instruments that develop them, as well as in the applicable local regulations, and therefore undertakes to guarantee their exercise and enjoyment. In the same way, we refrain from carrying out behaviors that may affect them.

6. What are conflicts of interest and how do we handle

What are conflicts of interest?

When personal and family activities and interests, or those of friends and associates, interfere or may interfere with our independence to make decisions. We may be facing a conflict of interest.

How to know if we are facing a conflict of interest?

To establish whether we are facing a possible conflict of interest, we can ask ourselves the following questions:

Is my personal wealth, that of my family or friends, benefited by the decisions that I must take at comocom?

Could anyone consider that certain behavior is benefiting my personal interests, those of my family or friends?

In order to prevent the existence of conflicts of interest:

We do not carry out activities outside comocom, if they create a conflict of interest with the company, interfere with our responsibilities or pose a risk to comocom's reputation.

We refrain from carrying out for our own benefit, directly or indirectly, those activities to which it is dedicated as comocom.

We refrain from acting, without prior authorization, when we have the question of whether or not we are faced with a conflict of interest.

We avoid participating in activities or managing businesses contrary to the interests of comocom, or that may harm the fulfillment of our duties and responsibilities.

How do we handle conflicts of interest?

When we are faced with a conflict of interest or a situation that may eventually generate a conflict of interest and / or that generates doubts, we disclose it in a timely and appropriate manner to the Ethics Committee. We describe the situation in a complete and detailed manner, document the event and provide all the information that is relevant for making the respective decision. Any person linked to the company must formally report, through the Ethics Line any behavior of their own or of third parties that involves a conflict of interest and in general, a violation of this Code.

Where can I report behavior that violates this code of ethics?

The comocom Ethics Line provides employees and partners with a confidential way to report activities or behaviors that are contrary to our Code of Ethics and Conduct or are illegal. All reports will be carefully reviewed by comocom.

You can access our ethics line by visiting our website.

7. Legal Compliance

comocom comply with all relevant legal requirements in so far as they apply to the activities of the company.

Administration of the Code of Ethics and Conduct

The Board of Directors shall assume responsibility for Governance and Compliance requirements and the implementation of this policy. The Board shall review, on an annual basis, the implementation and effectiveness of this Policy and shall ensure that:

- Personnel within the relevant business units are made aware of the this Code.
- All new personnel are made aware of the Code and given training or guidance on its operation.

Non-Compliance

Non-compliance with the Code will be deemed to be a breach of the relevant contract of employment or contract with the relevant party. Non-compliance by employees will give rise to disciplinary proceedings which may result in dismissal for gross misconduct.

All instances of non-compliance with this Code should be reported to Managing Director.

All communications will be held in confidence and, if requested, can be on an anonymous basis.

Carlos Valero

Managing Director

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