



CODE OF CONDUCT AND REGULATORY COMPLIANCE ALTURA CLOUD, S.L.

I. INTRODUCTION AND BACKGROUND

Since its foundation in 2016, the efforts of ALTURA CLOUD, S.L. (AUSUM CLOUD or the Company) has been guided by the need to offer its customers the highest quality products and services.

AUSUM CLOUD combined this commitment to quality with its engagement in the industry's technological advances and in the occupational health and safety of its employees when working on the company's business and processes.

Based on this goal and on the effort, commitment and integrity of all those who work and collaborate with AUSUM CLOUD, the company has earned a solid reputation, a reputation that requires ongoing attention and commitment.

Shareholders, customers, suppliers and society at large are increasingly demanding higher levels of responsibility from companies. Responding effectively to these demands is one of the cornerstones to AUSUM CLOUD's reputation. Everyone associated with AUSUM CLOUD can influence this reputation through the relationships they establish in their daily work. It is everyone's responsibility to uphold this reputation by behaving with integrity, responsibility and respect.

The purpose of this document is to familiarize the AUSUM CLOUD team, its customers and suppliers with the values and general principles that should serve as a guide for their work and professional activity in relation to the company.

This code applies to everyone professionally associated with AUSUM CLOUD, from employees to managers and directors, which means that everyone needs to read, understand and share this code. The policy cannot address all possible situations, nor is it designed to be a list of rigid workplace rules. However, the values and principles it outlines should always inspire the conduct of AUSUM CLOUD team members and set the limits for certain actions.

Therefore, with this Code, AUSUM CLOUD aims to guarantee ethical conduct in the performance of its work, beyond the mandatory compliance with the law. We can only achieve this if all our professionals strictly follow our ethical principles and corporate values and if we only collaborate with companies that share our exacting standards of ethics and corporate responsibility.

The following are the guiding principles that everyone who works or collaborates with AUSUM



must follow when performing their duties and responsibilities, in all the professional fields in which they represent the Company, as well as its clients and suppliers.

II. COMMITMENT TO AND COMPLIANCE WITH CURRENT LEGISLATION

Regulatory compliance is a prerequisite for this Code. All members of the AUSUM CLOUD team must comply with the legislation in force in each of the countries in which AUSUM CLOUD operates.

Furthermore, all members of the AUSUM CLOUD team must know and comply with the company's rules and procedures, as well as the instructions that may be adopted as part of its development. The Company will always inform employees about the legal and internal regulations applicable to its operations.

To facilitate the due internal control, the decisions that AUSUM CLOUD team members make will follow a process that makes it possible to consistently establish both who is responsible for the decisions and whether they comply with the mandatory regulatory compliance, ensuring that the compliance of the decisions with internal and external regulations is verifiable in the event of a review by competent third parties or the company itself.

AUSUM CLOUD agrees to make the necessary means available so that its employees are familiar with and understand all applicable internal and external regulations.

In the event of any known breach of the Code, the company has a consultation and notification procedure, known as the WHISTLEBLOWER CHANNEL, through which anyone associated with the company can confidentially report any wrongdoing which they believe constitutes a breach of the Code. The specifics of the Whistleblower Channel will be set out in this document.

III. WORKPLACE DIGNITY

AUSUM CLOUD is a company that is committed to the respect, dignity and non-discrimination of everyone it comes into contact with, whether they are employees, collaborators, clients or suppliers. That is why the AUSUM CLOUD team will always be courteous to colleagues, stakeholders and third parties they deal with, respecting personal dignity, equal opportunities, dialogue and zero tolerance of discriminatory or derogatory behavior. Threats will not be tolerated, nor will violence or intimidation of any kind. Abusive, humiliating or offensive behavior, whether verbal or physical, will not be tolerated, nor will any kind of discrimination or harassment on the basis of origin, race, sex, age, religion, opinion or any other personal or group condition or circumstance.



IV. PROTECTING THE COMPANY'S FACILITIES, ASSETS, KNOWLEDGE AND RESOURCES

All members of the AUSUM CLOUD team are committed to protecting the company's facilities and equipment, and all employees are committed to keeping the workplace and facilities safe and in good working order, notifying managers when these are not in the expected condition or are not working properly. Everyone will do their part in keeping the facilities clean and tidy.

AUSUM CLOUD employees will use the company's goods and services efficiently and refrain from using them for their own benefit.

To this end, under no circumstances will AUSUM CLOUD employees use the technical equipment or devices that the Company makes available to them to install or download programs, applications or contents that are illegal to use, that violate the company's rules or that could damage its reputation or the operation of said equipment or devices. They will also not use company funds or cards to cover expenses that are not job-related.

AUSUM CLOUD staff need to be aware that the documents and data contained in AUSUM CLOUD's information technology systems and equipment may be subject to review by the Company, or by third parties appointed by the Company, when necessary and permitted by the regulations in force.

AUSUM CLOUD staff are expressly prohibited from forwarding corporate messages or documents to employees' private accounts or those of family members or friends, since these do not enjoy the same level of security as the Company's systems. Nor are they allowed to configure the corporate email account for automatic forwarding of messages received to email accounts outside the Company.

AUSUM CLOUD is committed to protecting its own and others' intellectual and industrial property. This includes, but is not limited to, copyrights, patents, trademarks, domain names, copyrights, design rights, database extraction rights and rights to technical know-how.

AUSUM CLOUD staff are expressly prohibited from using works, creations or distinctive signs of intellectual or industrial property of third parties without proof that the Company has the corresponding rights and/or licenses.

AUSUM CLOUD staff will take the required measures to protect intellectual and industrial property, ensuring that all processes and decisions in this respect are traceable, in the sense that they are documented, justifiable and verifiable.



V. BUSINESS RELATIONS

The entire AUSUM CLOUD team is required to act, in its dealings with customers, with respect and dignity, bearing in mind the different cultural sensitivities of each individual and not tolerating discrimination based on race, religion, age, nationality, gender or any other personal or social condition prohibited by law, with special consideration for people with disabilities.

AUSUM CLOUD protects its customers by establishing and implementing mandatory standards for all suppliers in terms of health and product safety, ensuring that all the products it sells do not pose risks to health and / or safety when used. The AUSUM CLOUD team will ensure that the above standards are followed, as well as the rest of the established rules and procedures regarding product labeling, quality and characteristics.

When performing their duties, AUSUM CLOUD employees will promote the Company's products based on objective standards, without misrepresenting the conditions or characteristics of the Company's products. The Company's advertising efforts will be conducted in a clear way to avoid giving false, misleading or deceptive information to customers or third parties.

VI. MARKET PERFORMANCE AND FAIR COMPETITION

AUSUM CLOUD competes fairly in the market and under no circumstances tolerates conduct that undermines free competition or that may be misleading, fraudulent or malicious.

The search for sales or market information by AUSUM CLOUD employees will always be conducted without breaching any regulations that may protect this information. Employees will refuse to receive information about competitors that has been wrongfully gathered or obtained in breach of any confidentiality agreement. Specifically, exceptional care is taken not to use confidential information or company secrets when professionals from other companies in the sector join AUSUM CLOUD.

Company employees will also refrain from spreading incorrect, malicious or false information about the company's competitors.

VII. SUPPLIER RELATIONS

AUSUM CLOUD employees will interact with suppliers of goods and services in a legal, ethical and respectful way.

Suppliers will be selected according to objective and transparent standards, balancing the



company's interest in obtaining the best conditions with the convenience of maintaining stable relationships with ethical and responsible suppliers.

All the suppliers that work with AUSUM CLOUD must commit to upholding the human and employment rights of all their employees, as well as to engaging and sharing these principles with their business partners.

Purchasing and procurement will be done in strict compliance with the Company's applicable rules and procedures. All decisions made in this area must be substantiated, in the sense that they are documented, justifiable and verifiable in the event of review by third parties or by AUSUM CLOUD's own supervisory authorities. AUSUM CLOUD staff have a duty to protect business-sensitive information relating to the terms and conditions the Company has set in relation to its supply chain.

AUSUM CLOUD employees will not request from suppliers or accept information regarding terms and conditions from other companies competing with AUSUM CLOUD.

No AUSUM CLOUD employee may offer, grant, solicit or accept, directly or indirectly, gifts or gratuities, favors or compensation, in cash or in kind, of any nature whatsoever, that may influence the decision-making process related to performing the duties associated with his or her job.

Any gift or gratuity received in breach of this Code must be immediately returned and the situation reported.

In the event that AUSUM CLOUD detects that a supplier is not behaving in accordance with the standards set out in this Code of Conduct, AUSUM CLOUD will terminate all business relations with the supplier.

VIII. ENVIRONMENTAL PROTECTION, SAFETY, HEALTH AND SOCIAL DEVELOPMENT

AUSUM CLOUD's Corporate Social Responsibility, defined as its social and environmental commitment regarding its operations and for the benefit of all the stakeholders it interacts with, is an integral part of its business culture.

AUSUM CLOUD employees will perform their duties in a way that promotes the company's social and environmental sustainability, as a way to responsibly create value.



IX. CONFLICTS OF INTEREST

The AUSUM CLOUD team will avoid situations that may pose a conflict between their personal interests and those of the Company. They must also refrain from representing the Company and from interfering with or influencing decision-making in which they or an associated third party have a direct or indirect personal interest. They may not use their position in the Company to gain financial or personal advantages or personal business opportunities.

AUSUM CLOUD respects the privacy of its staff and therefore the privacy of their decisions. Within the framework of this policy of respect, employees are urged to inform AUSUM CLOUD of any personal or family conflicts of interest that may jeopardize the objectivity or professionalism their role in AUSUM CLOUD requires, so that the Company can adopt the necessary measures in the interest of both AUSUM CLOUD and the individuals involved.

More specifically, the following are potential situations of conflict:

- Performance by the employee or by individuals directly or indirectly related to him/her, either personally or through a company or institution, of activities that constitute the same, similar or complementary type of business as AUSUM CLOUD.
- Performance by the employee or by individuals directly or indirectly related to him/her, either personally or through a company or institution, of activities that result in the exchange of goods and/or services with AUSUM CLOUD, whatever the agreed remuneration system may be.

AUSUM CLOUD employees may not be members of any board of directors or governing body of any company that has business relations with AUSUM CLOUD. They may sit on the boards of non-governmental and non-profit organizations.

Furthermore, AUSUM CLOUD employees agree not to use privileged information for their own benefit or for the benefit of a third party.

X. GOVERNMENTS AND PUBLIC ADMINISTRATIONS

AUSUM CLOUD employees will deal with public authorities and institutions in a legal, ethical, respectful way that aligns with international regulations for the prevention of corruption and bribery.

Staff who deal with public administrations must document any decisions made and provide evidence of compliance with the applicable internal and external regulations, with the aim of facilitating the review of regulatory compliance in this area by third parties and the company's supervisory authorities.



As a general rule, no AUSUM CLOUD employee may directly or indirectly offer, grant, request or accept gifts or gratuities, favors or compensation, whatever their nature, to or from any authorities or officials.

In those countries that have requirements and restrictions on international trade, AUSUM CLOUD employees will strictly comply with the regulations in force and will submit the required information on their operations to the authorities upon request.

XI. WHISTLEBLOWER CHANNEL

The system for dealing with possible violations of this Code of Ethics will be administered by the Ethics Manager that AUSUM CLOUD has appointed.

The company's Board of Directors will appoint the Ethics Manager and will formally report to the Board at the end of each fiscal year.

Any AUSUM CLOUD employee or company stakeholder (shareholders, customers, suppliers, etc.) may report any alleged breaches of this Code of Ethics to the Ethics Officer, whose email address is canaletico@ausum.cloud

The Ethics Officer will analyze the information submitted, request the corresponding evidence and, if necessary, submit the files with all the information in his or her possession to company management.

The person who reported the non-compliance will be given the option to be informed of the progress of the process and its resolution.

The files processed by the Ethical Manager must be analyzed regularly by AUSUM CLOUD's administrative board, who in any event must close the case by adopting the measures it deems necessary and sign the files as proof of acknowledgment.

The system ensures confidentiality at every stage of the process and guarantees the absence of any type of reprisal or negative consequence for the whistleblower.

Barcelona, February 1, 2019