

CODE OF ETHICS

Our Principles of Conduct form the basis of our *Code of Ethics* and the prestige our company enjoys in its sector, enabling us to earn the trust of our shareholders, customers and suppliers.

Our principles define the way we conduct our business, and we use all means at our disposal to ensure that our employees share and apply them, in order to achieve a common vision.

Our partners and suppliers are familiar with our Principles of Conduct, and INURBA MOBILITY, in turn, is familiar with and respects the Principles of Conduct of the companies with which it has commercial relationships.

Article 1. Purpose and scope of application

1. INURBA MOBILITY (the "Company") wishes to bring its conduct and that of its employees into line with current legislation and its internal policies.

This *Code of Ethics* reflects the aforementioned commitment and is intended to develop the Company's ethical principles and serve as a guide for the conduct of the Company's professionals.

The *Code of Ethics* has been drawn up taking into account good governance recommendations and the principles of social responsibility accepted and promoted by the Company's management, and reflects the Company's commitment to the principles of business ethics and transparency in all areas of activity, while also responding to the new prevention obligations imposed in the area of criminal liability of legal persons.

2. The principles contained in the *Code of Ethics* apply to all professionals, managers and employees of the Company, regardless of their hierarchical level and geographical or functional location.

Article 2. Commitments made

1. The Company's Board of Directors has approved the INURBA MOBILITY *Code of Ethics* as a guarantee of its commitment to ethics vis-à-vis all persons or entities with whom the company conducts its activities and vis-à-vis its shareholders.
2. The *Code of Ethics* establishes the criteria to guide the conduct of the Company's professionals and managers.
3. INURBA MOBILITY professionals shall strictly comply with the laws in force in the place where they carry out their activities, in accordance with the spirit and purpose of the regulations, and shall observe the provisions of *the Code of Ethics* and the basic procedures and internal regulations governing the company's activities, as well as the commitments assumed in their contractual relationships with third parties.
4. The main criteria to which the conduct of INURBA MOBILITY professionals must conform are professionalism, integrity and legality. Conduct must be ethically acceptable and legally valid.

Article 3. Principle of non-discrimination and equality

1. We promote non-discrimination on the basis of age, sex, marital status, sexual orientation, ideology, political opinions, religion, ethnicity, nationality, social origin, or any other personal, physical or social condition of our professionals, as well as equal opportunities among them.

2. In particular, the Company will promote equal treatment between men and women in terms of access to employment, training, professional advancement and working conditions. At INURBA MOBILITY, we respect our employees' personal and family lives and promote work-life balance programmes that facilitate a better balance between these and work responsibilities.
3. We reject any manifestation of physical or psychological harassment, violence, abuse of authority at work or any other conduct that creates an environment that is offensive to the personal rights of its employees. Specifically, the Company will promote measures to prevent sexual harassment when deemed necessary.

Article 4. Right to privacy

1. We respect our employees' right to privacy in all its forms, particularly with regard to personal, medical and financial data. INURBA MOBILITY professionals undertake to make responsible use of the resources made available to them by the Company and of the computer systems. These resources are provided for professional use.
2. We protect and take measures to safeguard the confidential and personal information in our possession, collecting and processing data in accordance with applicable laws, professional obligations and our own data management policies and practices.
3. We undertake not to disclose personal data relating to our employees, except with the consent of the data subjects and in cases of legal obligation or compliance with judicial or administrative decisions. Under no circumstances may the personal data of professionals be processed for purposes other than those provided for by law or contract. The use of any confidential information about our customers for personal gain or for the benefit of third parties is prohibited.

Article 5. Health and safety at work

1. INURBA MOBILITY promotes an occupational health and safety programme and will adopt the preventive measures established in this regard in current legislation, with the aim of preventing and minimising occupational risks.

Article 6. Training

1. Training programmes promote equal opportunities and the professional development of our employees.
2. INURBA MOBILITY professionals are committed to continuously updating their technical and management knowledge and taking advantage of the Company's training programmes.

Article 7. Staff selection

1. We will maintain an objective and rigorous selection programme, taking into account the academic, personal and professional merits of the candidates and the needs of the Company.

Article 8. Means for the development of professional activity

1. We undertake to provide our professionals with the resources and means necessary for the development of their professional activity. INURBA MOBILITY professionals undertake to make responsible use of the resources and means made available to them, carrying out exclusively professional activities in the interests of the Company.
2. INURBA MOBILITY owns the rights to use and exploit the computer programmes and systems, equipment and manuals used by its professionals in the course of their work. INURBA MOBILITY professionals shall respect the principle of confidentiality with regard to the characteristics of the rights, licences, programmes, systems and technological knowledge in general, the ownership or rights of exploitation or use of which belong to the Company.

The use of the equipment, systems and computer programmes that INURBA MOBILITY makes available to its professionals for the performance of their work must comply with security and efficiency criteria, excluding any use, action or computer function that is unlawful or contrary to the Company's rules or instructions. Professionals shall not exploit, reproduce, replicate or transfer the Company's computer systems and applications for purposes unrelated to their work. Likewise, professionals shall not install or use programmes or applications on the computer equipment provided by the Company that are illegal or that may damage the systems or harm the image or interests of the Company, its clients or third parties.

Article 9. Invitations and Gifts

1. As a general rule, INURBA MOBILITY professionals may not give or accept gifts in the course of their professional activities. They may give and accept gifts when they are of negligible economic value, are given as a courtesy or as part of normal business practice, and are not prohibited by law.
2. We do not tolerate corruption or the acceptance or offering of bribes. Acts of bribery, which are expressly prohibited, include the direct or indirect offering or promise of any type of improper advantage, any instrument for its concealment, as well as influence peddling.
3. INURBA MOBILITY professionals may not give or accept hospitality that influences or may influence decision-making.

4. When in doubt, the offer should be rejected or, where appropriate, consulted with the immediate superior or the Compliance Officer.

Article 10. Human and Labour Rights

1. INURBA MOBILITY expresses its absolute commitment to the human and labour rights recognised in national and international legislation and to the principles set out in the *United Nations Global Compact*, the *OECD Guidelines* and the *Social Policy of the International Labour Organisation*.

Article 11. Relationship with Shareholders

1. INURBA MOBILITY's purpose is to continuously create value for its shareholders, and it is therefore committed to providing objective, transparent, adequate and timely information on the company's performance under equal conditions for all shareholders.
2. We work to ensure that economic and financial performance increases the value of the company, thereby compensating shareholders for the risk they assume when investing their capital.

Article 12. Relationship with Customers

1. All INURBA MOBILITY professionals are required to act with consideration, respect and dignity in their relations with customers. The Company protects its customers by establishing and implementing mandatory standards for all its products/services.
2. INURBA MOBILITY guarantees the confidentiality of its customers' data, undertaking not to disclose it to third parties, except with the customer's consent or when legally required to do so.
3. The collection, use and processing of our customers' personal data must be carried out in such a way as to guarantee their right to privacy and compliance with legislation on the protection of personal data, as well as the rights recognised to customers by legislation on information society services and electronic commerce and other applicable provisions.

Article 13. Relationship with Suppliers

1. The selection of suppliers shall be governed by criteria of objectivity and transparency, reconciling the company's interest in obtaining the best conditions with the desirability of maintaining stable relationships with ethical and responsible suppliers.
2. INURBA MOBILITY shall adapt its supplier selection processes to criteria of objectivity and impartiality and shall avoid any conflict of interest or favouritism in its selection.

Article 14. Relationship with the Market

1. INURBA MOBILITY undertakes to compete fairly in the markets and will not engage in misleading or disparaging advertising of its competitors or third parties.
2. The Company undertakes to promote free competition for the benefit of consumers and/or users. The Company shall comply with competition law, avoiding any conduct that constitutes or may constitute collusion, abuse or restriction of competition.
3. INURBA MOBILITY employees shall reject information about competitors obtained improperly or in violation of the confidentiality under which it is held by its legitimate owners.

Article 15. Environmental protection

1. INURBA MOBILITY carries out its activities with respect for the environment, complying with the standards established in the applicable environmental regulations.
2. Social and environmental commitment in the development of its activities is an integral part of its business model. To this end, it has defined a clear policy and protocols and has implemented an environmental management system that optimises resource and waste management and reduces the negative environmental impacts of its activity.

Article 16. Creation of the Whistleblowing Channel

1. INURBA MOBILITY will launch a Whistleblower Channel with the aim of promoting compliance with the law and the rules of conduct established in the *Code of Ethics* and other company policies.
2. Its function is to serve as a means for Company employees to report conduct that may involve the commission of any irregularity or any act contrary to the law or the rules of conduct of *the Code of Ethics* or any other regulations, or to consult any doubts that may arise regarding its interpretation.

Article 17. Dissemination, training and communication

1. The Compliance Officer of INURBA MOBILITY shall promote the dissemination of the content of *the Code of Ethics* among the Company's employees and among all agents and stakeholders related to the Company.
2. Dissemination shall be carried out through specific training and internal communication plans and actions.

Article 18. Disciplinary regime

1. INURBA MOBILITY shall in turn develop the necessary measures for the effective application of the *Code of Ethics*.
2. When a breach of the provisions of the Law or the *Code of Ethics* is detected within the Company, the Compliance Officer shall instruct the Human Resources Department to apply disciplinary measures in accordance with the system of offences and penalties provided for in the INURBA MOBILITY collective agreement.

Article 19. Acceptance

1. INURBA MOBILITY employees expressly accept the rules of conduct set out in the *Code of Ethics*.
2. The *Code of Ethics* shall be made available to all professionals within the Company.

Article 20. Approval and modification

1. The *Code of Ethics* shall be reviewed and updated periodically. Any employee may make proposals for improvement or promote the updating of *the Code of Ethics* as a whole.
2. The revision of the Code shall be adopted by the Company's Management Committee and ratified by its shareholders.

The *Code of Ethics* was approved at the Company's Board of Directors meeting held on 31 March 2021.