

At SPN SOFTWARE we are convinced of the need we have to act with integrity. It is one of our beliefs. To live our beliefs and therefore comply with this code, it is essential that we are people of moral quality and that it is natural for us to comply with it, preaching by example.

Complying with the provisions of our code of ethics will always lead us to have the satisfaction of having acted loyally with our company and with our stakeholders in a clear and honest manner, in an environment of trust and cordiality in all aspects of our lives, both personally and professionally.

The observance of this code and of all the policies that come from it, is strictly obligatory. Failure to do so may result in disciplinary action that may extend to the termination of the employment relationship and / or legal action, in accordance with the country's legislation. The employees of SPN SOFTWARE have the obligation to report any deviation that is of our knowledge.

#1. With our customers:

Our customers are the essence for which we exist. Your satisfaction is essential to our success. Therefore, the quality of our products, as well as our service are the main commitment with them. Our clients are our strategic allies and for this reason we strive to make our business proposal support its growth and development.

In our dealings with clients, there is no room for any kind of corruption, bribery, favoritism or any activity that is contrary to the laws, good customs or threatens the health of the population.

#2. With our shareholders and partners:

We seek to establish the best corporate practices to give total transparency and certainty to our shareholders. We are convinced that good corporate governance strengthens the mandate of shareholders to be a well-managed, socially responsible, efficient and profitable company, and therefore we strive to be a management model. Our commitment is to provide our shareholders and partners with a reasonable return on their investment in a sustained manner, creating value in the long term.

Our companies comply, according to legislation, with the necessary information so that the decisions of our shareholders and partners are made on a consistent, homogeneous and known basis. This information is always based on transparent and clear accounting, in accordance with the applicable regulations. We use resources prudently and profitably, observing rules of ethical and legal conduct in all our business practices and transactions that we perform.

#3. With our collaborators:

In SPN SOFTWARE we seek that all collaborators are respected and that they find an adequate space for their development both in the professional field and in the personnel. The treatment

with our collaborators is based on the golden rule: respect, justice, trust and affection, for which all types of mistreatment, forced labor or unworthy treatment, must be reported.

a) Respect for individuality

Each person has a unique value and we recognize that their individual contribution is essential for the team in which they work. For this reason, we respect them and do not allow any type of discrimination to exist, whether due to age, religion, sex, race, sexual preference or any other condition protected by the laws of the community in which we operate. This provision applies to all aspects of employment, including recruitment, selection, promotion, change of position, transfers, termination of employment, compensation, education, training and in general to all working conditions. In SPN SOFTWARE we respect and value the dignity of the person, so we reject any form of discrimination, abuse or mistreatment of people and any type of offense that violates their rights.

b) Development and values

We are committed to fostering the development of our personnel and fostering an appreciation of moral values and ethical standards. We transmit and spread our beliefs through our behavior.

We recognize that trust is the basis for a close and lasting relationship and that it is based on the integrity of the person. In SPN SOFTWARE we believe in the good faith of the other unless proven otherwise. We do not tolerate any type of harassment or conditioning to the staff, nor that the success of a person depends on favoritism or bribes. Our commitment is to maintain a work environment against harassment, including language or behavior that may be intimidating, discriminatory and / or offensive. We understand that this position of respect will provide our staff with security in their employment that will allow them to trust the Company and dedicate themselves to their tasks with care. We provide the staff with the relevant facilities so that they develop their talent and skills and can apply it to take on greater responsibilities, within the opportunities presented to them.

c) Safety and well-being

At SPN SOFTWARE we are committed to providing a safe, healthy work environment and maintaining a culture of safety and well-being among staff, their families and the communities where we operate. The above will not be achieved without a true commitment to safety and well-being, which is visible and demonstrated by all employees. Both managers and collaborators must maintain a high level of attention and knowledge of the dangers to which they are exposed and the ways to prevent them. You should never expose your own or a collaborator's physical integrity for the intention and need to fulfill the task or goal. The intention to comply with the objectives and goals is based at all times on safe and individual group behavior and adherence to

the SPN SOFTWARE security rules and procedures. As a company, we must keep in mind the safety of customers, external business partners and the social environment in which we conduct our operations to take care of the physical integrity of all.

d) Clarity and responsibility in the functions

We recognize the importance of transmitting to our collaborators the information they require for the fulfillment of their functions, because only then can they be involved with the objectives and priority projects of the company; to achieve them with integrity, professionalism and enthusiasm.

e) Confidentiality

When we integrate a collaborator to SPN SOFTWARE, the latter assumes the commitment to give responsible and legitimate use to the information to which it has access, keeping at all times the confidentiality and security of the information as intellectual property and industrial secret of the company, represented essentially by its manufacturing processes, information systems and marketing schemes, including financial information, products and personnel. Even in the event that any collaborator for any reason stops working for SPN SOFTWARE, they must maintain this commitment to which they are subject to professional ethics and to observing national laws.

f) Conflict of interests

We hope that all personnel work dedicatedly for the benefit of the company and all those who integrate it, without our decision making being affected by any factor that favors interests unrelated to productivity, effectiveness, efficiency and the fulfillment of our goals. In order to avoid conflicts between personal interests and those of the company and to promote a solution if required, all employees of SPN SOFTWARE have the responsibility to declare any financial or other interest that may enter in conflict with the company. If any employee considers that there are personal interests that may influence their performance at work or in their decision making, they must communicate it in writing to their immediate supervisor. All SPN SOFTWARE personnel must report annually and in writing the conflicts of interest that they have.

g) Integrity

In SPN SOFTWARE there is zero tolerance for acts of corruption, so we do not bribe, offer or give money, goods, favors or services to any person, in order to illegally obtain benefits, avoid sanctions or damages in the individual, in favor of the company or a third party. Our beliefs, the global integrity policy and all SPN SOFTWARE policies, as well as national laws, are above apparent utility. We maintain appropriate processes that comply with all applicable legislation and that foster a culture of integrity, control and legality, to prevent situations that could result in acts of corruption. Receiving money, gifts, favors or services, profoundly affects the results and puts into question

the reputation of the company and all of us who are part of it. These actions are illegal and may constitute a crime.

h) Conduct

Every collaborator must act in accordance with this code and the SPN SOFTWARE policies. Therefore, any collaborator who performs business practices or administrative management in terms different from those established by the company, such as: theft, fraud, use, sale, consumption and / or distribution of any narcotic will be in violation of the principles described therein, constituting a lack of integrity.

i) Austerity

We are convinced that the business and the daily operation of the company must be carried out in a context of simplicity and productivity. We are committed to carrying out all our business processes under the principle of austerity. We make efficient use of available resources at our disposal, avoiding waste, seeking to keep them in perfect working order, trying to maximize their capacity and prolong their useful life and the best use of our time. Our objective is the functionality of the expenses, always taking care that the dignity of the collaborators and their safety are respected.

j) Asset protection

Our commitment is to protect and optimize the value of the investment, mainly through the prudent and profitable use of resources, ensuring that they comply with the relevant safety standards. The custody and preservation of the assets of SPN SOFTWARE is the responsibility of each and every one of those who integrate the company. We understand the assets of the company not only the equipment or furniture but also the plans, designs, formulas, processes, systems, drawings, technology, product launch plans, business strategies, promotional campaigns and of course our brands. The use of the assets will be destined to the object of the business and it is strictly forbidden to make another use of them.

k) Information

All those who collaborate in SPN SOFTWARE have the obligation to report the information generated, product of their work, in an honest, safe and timely manner. All reports of services, customer requirements, complaints, suggestions, accounting, should be an accurate reflection of reality, regardless of the destination of such information.

#4. With our suppliers:

a) Treatment

With our suppliers we are committed to carry out honest and fair negotiations, without discrimination and / or impositions. Every provider will always be treated with the

golden rule: respect, justice, trust and affection. Our commitment is a deal that includes not only respect for the people who represent the external business partners, but also the provision of the necessary information of the results of the contests and bids, so that these processes are transparent and fair.

b) Selection and development

All the proposals that our suppliers make will be reviewed in a comprehensive manner considering the price, the added value, the quality and the service they offer. We award the highest value to fair competition in the evaluation process for the selection of the best. We must be consistent with the commitment we acquire to build lasting, equitable and fair business relationships. We are also committed to protecting the rights of the providers in what corresponds to the confidentiality of the information provided, expecting in return that the suppliers comply with the policies of SPN SOFTWARE. We involve our external business partners, seeking their development and providing them with support and information to improve the characteristics of the materials and services we require from them, through a long-term relationship of trust.

c) Conditions

We consider that one of our main commitments with our suppliers is the timely payment for their services and products. To this end, we establish clear agreements regarding payment terms and we define stable, simple and transparent processes that do not lend themselves to interpretation or bad practices. We aspire to have suppliers that in each transaction obtain fair benefits that promote their sustainable development, to be able to offer a service that evolves in all its elements, not only in the price. Committed to promoting the legality of operations, we are careful that our suppliers do not engage in illegal practices such as acts of corruption, money laundering, failure to comply with their fiscal, environmental or social obligations, such as social security payments, taxes or work of minors, according to the laws. SPN SOFTWARE will not sustain any commercial relationship with suppliers that engage in this type of practice. We seek that our suppliers help us to offer products and services of excellence, therefore, we work with those that guarantee us the highest standards of quality and food safety. SPN SOFTWARE encourages the care of the environment and biodiversity and therefore expects its suppliers to do so as well.

d) Integrity

We make our suppliers participate in our principle of personal integrity and therefore we ask them to assume the responsibility of not offering rewards or gifts to our collaborators, adhering to our code of conduct for suppliers and other third parties. We put our information e-mails at your disposal as a space to express your comments, suggestions and complaints in a confidentiality framework. We assume the commitment to thoroughly review each case and act accordingly.

#5. With our competence:

In SPN SOFTWARE we are committed to compete in the market based on price, quality and service, in a framework of integrity, respecting our competitors in every way. All advertising or promotion is based on the truth and complying with the legislation of each country regarding competition. We compete through quality, service and commercial strategy, according to our principles and beliefs. We respect our competitors and whenever we have to talk about them we will use information based on facts. Any comparison with the competition will be made using exact terms, without qualifiers and without using misleading information or argumentation. The relationship with our competitors will always be in line with our policies, so if we have contact or agree with their representatives, we will behave professionally and we will not share company information.

6 With the government:**a) Respect for the laws**

We keep informed of the laws and make the necessary adaptations to avoid any violation. This principle applies to all business areas without exception. Failure to comply with the law is a crime that can cause the company severe economic damage and deterioration in its image. Within the legal framework, we cooperate with the authorities in their actions with friendly and respectful treatment, so we avoid any act with any level of Government that could be interpreted as corruption or bribery. We have clear rules in our anti-corruption policy on how to act against acts of or towards public officials. To the extent possible, we participate in the relevant bodies to analyze and understand the legislation, always in the most respectful manner and with the spirit of collaborating with the development of the corresponding country.

b) Participation in political activities

We do not speak for any ideological or partisan affiliation, but we encourage civic collaboration in professional associations and citizen organizations, while encouraging the responsible exercise of political rights. The participation of the collaborators in political and / or electoral processes will be entirely in a personal capacity. Said participation may not include financial support or resources belonging to the company, nor contributions of working time. When a collaborator chooses to participate in politics, contribute and give his opinion, he will do so as an individual and should not give the appearance of acting on behalf and / or representation of SPN SOFTWARE.

7 With society:

We recognize that our raison d'être is the society in which we are immersed, it is to whom we owe and for whom we work. Therefore, we promote volunteering among our staff, and we are committed to supporting our work, daily attitudes and our beliefs to the community in which we live.

a) Generation and conservation of employment

We are committed to the economic and social growth of the community through the creation and maintenance of sources of decent and productive employment. We train our collaborators. As a company, we invest in the training of our staff and do everything possible to maintain the work of those who perform their duties properly and maintain a positive attitude.

b) External communication

We are committed to our campaigns to promote the strengthening of universal ethical values, understanding them as the family unit, the physical and emotional integrity of people, respect for the universal rights of children, respect for people with disabilities, the third age or of any ethnic group or social condition, among others. We are aware of the impact of our advertising and for that reason we take care that it is always responsible and truthful, taking care that it can not lead to erroneous interpretations regarding nutritional value, use and attributes of the products.