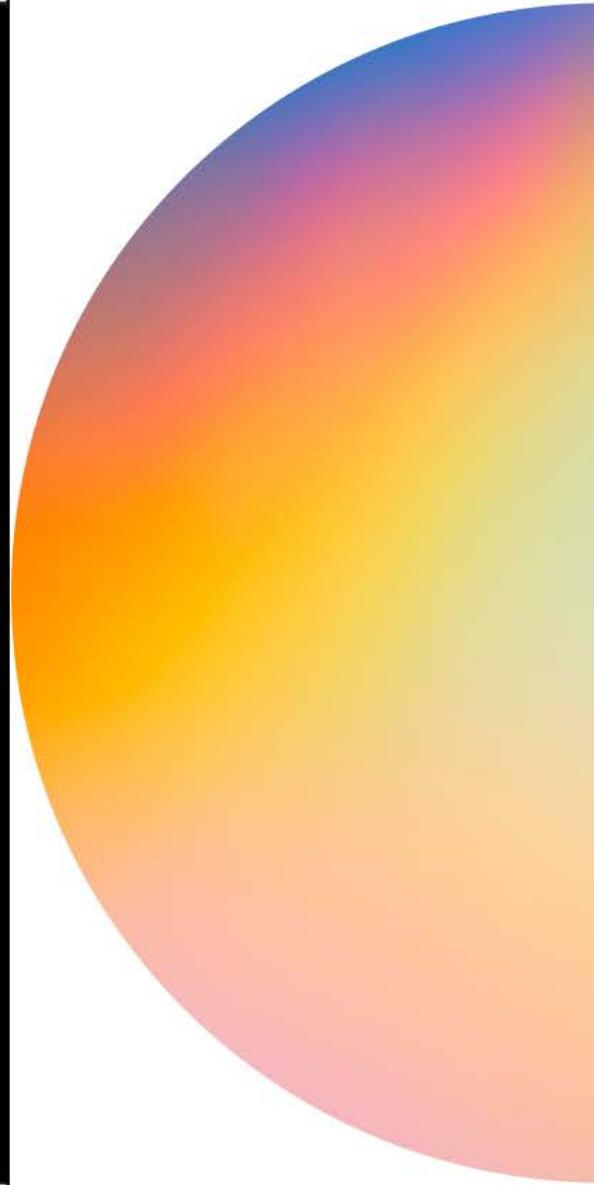
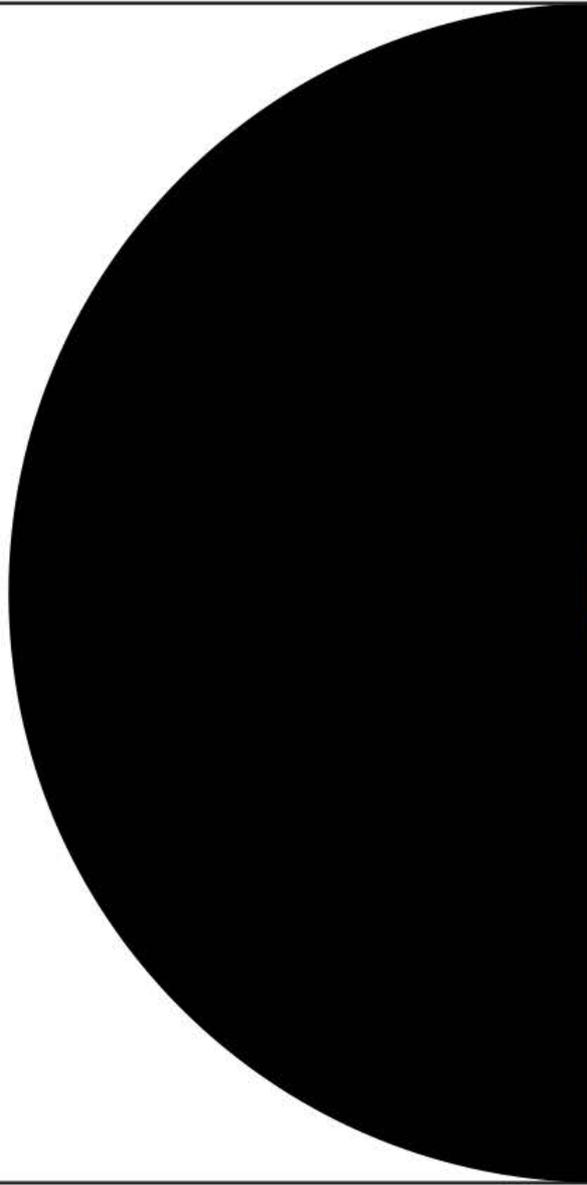


**JUNGLE21**



**CODE OF ETHICS**

**PRINCIPLES OF BUSINESS CONDUCT**

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# 1. Introduction to the code of ethics

Jungle21 is an independent company that believes that ideas are capable of changing everything. A company that takes its work very seriously. But above all, it is a company where people are placed above all else. That is why our values are rooted in tolerance, inclusion, and respect because we believe that it will only be possible to become leaders in the industry if we are leaders as a team first.

To this end, we have created a Code of Ethics that will encourage work by guidelines that will help us to strengthen the trust between Jungle21 and its clients, and that will have the ultimate goal of continuing to build a strong, principled and value-driven company in which we all feel safe and proud to work.



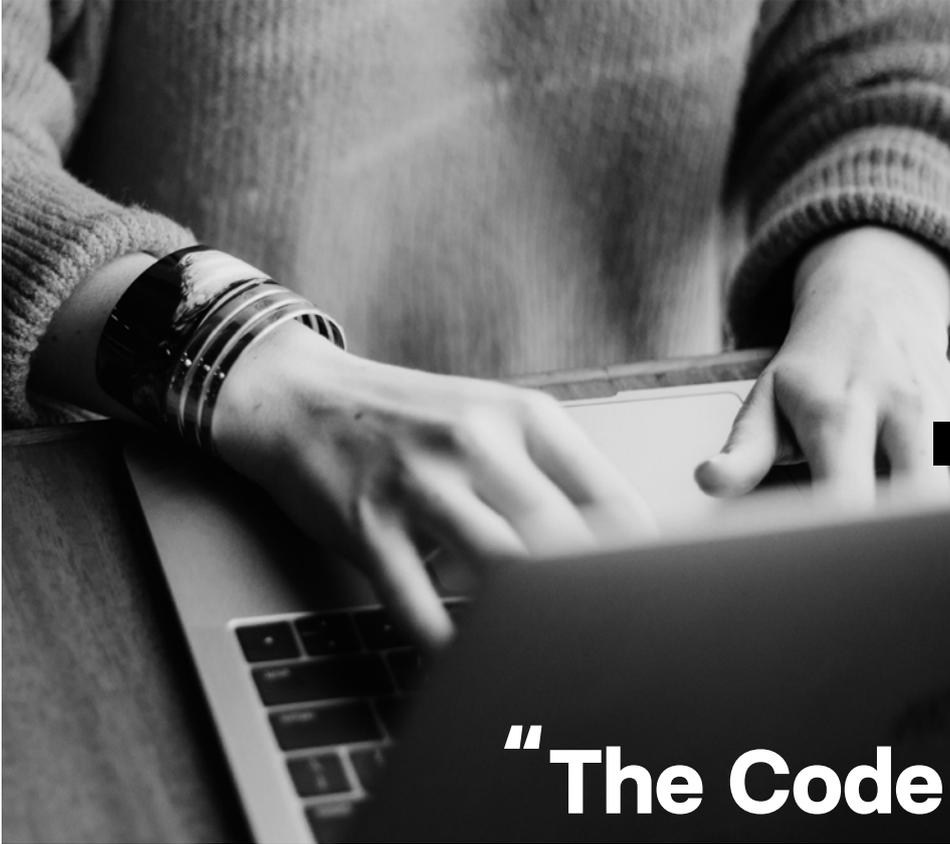
***Our culture and way of understanding things must be reflected in this Code of Ethics, which is based on 3 fundamental pillars:***

- 1. Integrity and respect for others.*
- 2. Building an environment of trust and freedom.*
- 3. Motivation and daily demand to exceed the expectations of our clients.*

This document is not intended to be exhaustive but rather a basic guide to Jungle21's ethical principles to help us all know how to act in different circumstances, and to continue to maintain the highest standards of ethical behavior.

## 2. The value of ethics

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**“The Code of Ethics  
must be part of  
your essence as  
a professional”**

■

To become the united and integrated team we want to be and to move in the same direction, the Code of Ethics must be part of your essence as a professional and be reflected in your image, attitude, and respect for others. No matter what your position or level of responsibility, we are all obliged to comply with and disseminate the values that define us as a company.

## 2. The value of ethics

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In your day-to-day work, you will come across situations in which you may not know how to act. You will find the answer in the Code of Ethics, which you should consult whenever you have any doubts. It is also your responsibility to report any conduct contrary to the company's principles and values, always acting with honesty, transparency, and ethics. For our part, and so that we can continue to grow together in an environment of trust, we are committed to providing training on the Code of Ethics to the professionals who make up the company.



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# 3. Ethical principles

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All of us who make up Jungle21 are united by these 5 ethical principles that define our values and guidelines for behavior as professionals. They will become the reference guide that will help us make the right decision at all times:

## ■ 1 RESPECT, DIVERSITY AND FAIR TREATMENT.

We seek to promote equal opportunities among people of different genders, ethnic groups, religions, sexual orientation, political opinion, age, nationality, with functional diversities or illnesses. In the selection, hiring, and promotion processes, we follow objective procedures based on the principles of merit, ability, and suitability for the position. We do not tolerate any type of discrimination or disrespect.



## ■ 2 INTEGRITY.

We apply radical candor, we are frank, honest, and transparent with our opinions and our actions.

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## 3. Ethical principles

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### ■ 3 PROFESSIONAL GROWTH.

We invest in our team for their personal and professional growth. If they grow, so will our company. That's why we offer a safe and attractive work environment to develop as a professional.

### ■ 4 CONFIDENTIALITY, PRIVACY AND DATA PROTECTION.

We protect and take steps to preserve any sensitive or confidential information of our customers, company, or fellow employees. Disclosure of any confidential information is prohibited unless authorized, required, or permitted by law, law, or professional duty.



### ■ 5 PROFESSIONALISM.

Our clients always expect the best from us, so our work has to exceed their expectations. To do so, we assign to each client the best possible talent and competence that will elevate the brand to its highest potential.

## 4. The ethics committee

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**“It will always  
be chaired  
by the CEO  
and will consist  
of 4-6 people.”**

To safeguard compliance with the Code of Ethics, the management committee will appoint a committee in which we place our full confidence to monitor and address each case with respect and professionalism. It will always be chaired by the CEO and will consist of a minimum of 4 and a maximum of 6 people, selected on an equal basis from among the staff.

The Committee may act on its initiative or in response to a complaint following the established protocol:



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# 4. The ethics committee

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## ACTION PROTOCOL:

1

### COMMUNICATION AND COUNSELING

The objective of this phase is to inform and advise the person involved, and to prepare for the investigation phase, if necessary.

#### **To whom is the communication to be submitted?**

The communication should be submitted to two of the reference persons. When specifying the reference person, the following is required:

- At least two persons from the Ethics Committee.
- The reference persons must have specific training in the subject and meet the standards of care for the and meet the standards of care for this function.
- Maintain discretion and guarantee the confidentiality of the information.

**To communicate this, the affected person may choose to summon the two identified individuals to discuss the issue or complete/email them a form available in the onboarding document and stored in the company's shared environment, indicating:**

Names and surnames and the position of the person presenting the conflicting facts.

Names and surnames and position of the alleged person who has generated the ethical conflict, if applicable.

Names and surnames of those involved who can vouch for the situation. Description of the facts (place and dates, duration, frequency of events...).

# 4. The ethics committee

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## ACTION PROTOCOL:

2

### INVESTIGATION

The objective of this second phase is to thoroughly analyze the facts in order to issue a binding report on the evidence or not of an ethical conflict situation, as well as to propose intervention measures.

The investigation shall be initiated, at the latest, within 5 working days from the time a person notifies the committee.

#### **The functions of the entity that assumes the investigation will be:**

- Involve a person specialized and trained in the management of conflict situations. conflict situations. (HR)
- Analyze the situation and the accompanying documentation.
- Interview the person reporting the facts. If the documentation does not sufficiently describe the facts, you may be asked to provide an additional account of the facts.
- Interview potential witnesses, and inform them of the need to maintain confidentiality in the process.
- Evaluate whether preventive measures are necessary.
- Issue the binding report.

# 4. The ethics committee

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## ACTION PROTOCOL:

3

### RESOLUTION

The objective of this third and final phase is to take the necessary action taking into account the evidence, recommendations, and proposals for intervention in the binding report of the commission of inquiry.

According to the report prepared after the investigation, it is dictated whether:

- a) If there is sufficiently proven evidence of the existence of a situation of ethical conflict, the pertinent measures shall be adopted.
- b) If there is no sufficiently proven evidence of the existence of a situation of ethical conflict, the conflict shall be archived and recorded.

#### **False allegations**

All Jungle21 team members are committed to complying with the Code of Ethics. However, if, after investigation of a conflict situation, it is classified as false, the company reserves the right to take action, up to and including dismissal.



# 5. Our behavior

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The Code of Ethics and Conduct embodies our corporate philosophy and commitment, linking our business vision and strategy, corporate responsibility practices, ethical behavior and the values that should govern our behavior.

## ■ 1

### **CLIENTS RELATIONSHIPS.**

All employees are obliged to act in their relations with customers, according to criteria of consideration, respect and dignity, taking into account the different cultural sensitivity of each person and not allowing discrimination based on race, religion, age, nationality, gender or any other personal or social condition prohibited by law, with special consideration for the care of people with disabilities or handicaps. The clients are the fundamental asset of the agency.

All contractual relations and communications with the entity's customers are governed by the principles of honesty, professionalism, transparency, and the highest degree of collaboration.



## ■

## 2

### **SATISFACTION WITH CLIENTS.**

The entity considers it fundamental to maintain a high level of quality in the provision of its services and to maximize the satisfaction of its clients. The internal processes and the technology used by the entity are oriented to this end, as are the periodic investigations of its scope of action. The entity rejects any dilatory practice and acts permanently to implement increasingly faster and more agile processes, respecting internal control standards.

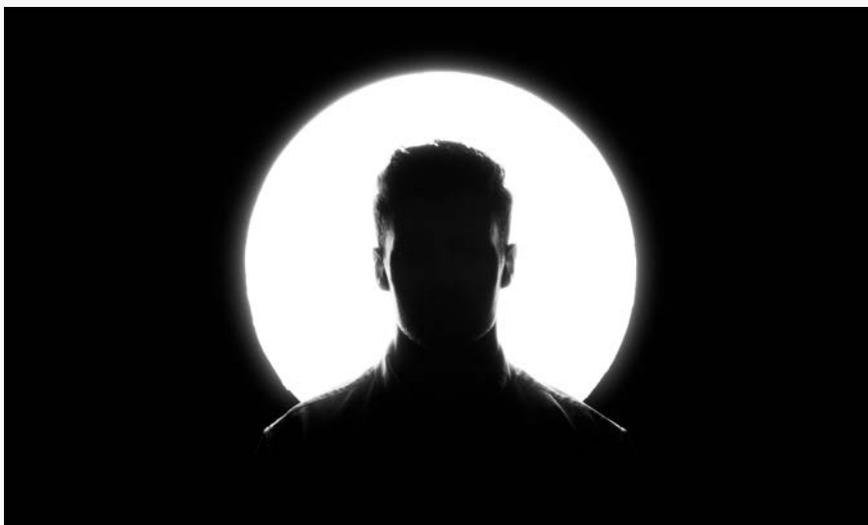
## 5. Our behavior

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### 3 RELATIONS WITH SUPPLIERS AND/OR COLLABORATORS.

■ External collaborators and suppliers make the daily development of the company's activity possible through their cooperation. The company recognizes the importance of this contribution, undertakes to deal with them in terms of equality and mutual respect, and meets their legitimate expectations to receive clear instructions regarding the nature of their tasks and to receive the payments due. Employees shall deal with suppliers of goods and services in a lawful, ethical and respectful manner.

The selection of suppliers will be governed by criteria of objectivity and transparency, reconciling the interest in obtaining the best conditions with the convenience of maintaining stable relationships with ethical and responsible suppliers. All suppliers working with Jungle21 must undertake to respect the human and labor rights of all contracted employees, as well as to involve and transmit these principles to their business partners. The violation of any of these principles will in no case be accepted by Jungle21. No employee may offer, grant, solicit or accept, directly or indirectly, gifts or handouts, favors, or compensation, in cash or in-kind, whatever their nature, which may influence the decision-making process related to the performance of the functions derived from their position.



# 5. Our behavior

## 4 CONFLICT OF INTERESTS.

Employees must avoid situations that may involve a conflict between their interests and those of the company. They must also refrain from representing the company and intervening in or influencing the decisions in which, directly or indirectly, they or third party related to having a personal interest. They may not use their position in the company to obtain patrimonial or personal advantages or business opportunities of their own.



None of the employees may provide services to another competing company, with the exception of services that may be provided at the request of Jungle21 Design Strategy S.A. or with the authorization of the Board of Directors / Management Committee.



The performance by the employee or by persons related to him, directly or indirectly, by himself or through any company or institution, of activities that generate the exchange of goods and/or services with Jungle21 Design Strategy S.A., whatever the agreed remuneration system, shall require the authorization of the Board of Directors and/or the Management Committee.

Any outside work or professional activity that may affect the company's working day must be previously authorized.



Every contractual relationship and communication with the entity's customers is governed by the principles of honesty, professionalism, transparency, and the highest degree of collaboration.

# 5. Our behavior

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## ■ 5 USE OF COMPANY GOODS AND SERVICES OF THE COMPANY.

Employees shall use the company's goods and services efficiently and shall not make use of them for their benefit. In this regard, employees shall in no case make use of the equipment that Jungle21 Design Strategy S.A. makes available to them to install or download programs, applications, or contents whose use is illegal, that contravenes the company's rules or that may damage its reputation.

They shall not use company funds or cards to pay for activities that are not part of their professional activity. Nor shall they use computers, cell phones, etc. for activities unrelated to the company's business without authorization from the Board of Directors.

Employees should be aware that the documents and data contained in the information technology systems and equipment may be subject to review by the competent units of the entity, or by third parties designated by the entity, when deemed necessary and permitted by the regulations in force.



# 5. Our behavior

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## 6 ■ OUR COMMITMENT ■ TO THE ENVIRONMENT.

As an energy-intensive company, we are aware of the importance of reducing energy consumption and costs and promoting environmental and economic sustainability. To be a proactive organization and an example for other companies in the sector in terms of energy efficiency, we have made certain commitments to continuously improve the management of energy consumption:

- Promote the efficient use of energy.
- Implement technologies and improve existing ones, to consume energy more efficiently.
- Improve energy consumption habits in terms of energy savings among workers and people outside the company who interact with it.

In general, to take care of the environment through the above-mentioned actions. Ensure the availability of information and resources necessary to achieve the established objectives and goals. Support the procurement of energy-efficient products and services and design to improve energy performance. Comply with legal requirements related to energy use, consumption, and efficiency.



## ■ 7 ■ ADVERTISING ■ OF THE CODE.

The Code will be provided to all employees in their language and will be published on the entity's website, thus making it available to any interested party. It will also be the subject of appropriate communication, training, and awareness-raising actions for its timely understanding and implementation throughout the organization.

## 5. Our behavior

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It is expected to act always and in any situation ethically and professionally. In the event of a situation that generates doubts, each professional should consider identifying the situation and seek help from the Ethics Committee. These questions can serve as a guide to help you think about the situation you are facing:

- Am I uncomfortable with the conflict situation? Why?
- How should I act so that my behavior reflects the spirit of the Code of Ethics?
- Is my conduct following the Code?
- Am I being fair and honest?
- Would Jungle21's or my reputation or interests be affected by disclosure?  
What has happened?
- What should I do to encourage ethical team behavior?
- Am I fulfilling my responsibilities and acting professionally, despite the difficulties my conduct may cause?
- the difficulties that my conduct may cause me?
- What are the consequences that could result from my behavior, either for me, for the firm, for the company, or the team?
- for me, for the firm, for the client, or any other person or entity?
- What steps could I take to mitigate the risks inherent in this situation?

**As part of the Jungle21 team your responsibility is:**

- a) Know and apply the behavioral guidelines established in this Code of Ethics.
  - b) Consult in case of doubt, always bearing in mind that the Code does not cover all possible situations, so if you have doubts, you should consult with a superior.
  - c) Do not tolerate behavior that deviates from the Code or any conduct that may damage the reputation or good name of Jungle21.
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# Attachment

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This Code of Ethics will be subject to review by the Committee on a semi-annual basis from its creation and will always be available at and will always be available at:

- Corporate website: [www.jungle21.com](http://www.jungle21.com)
- Employee portal

**Thank you**

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