

CODE OF CONDUCT



* Code approved by the Board of Directors of FOLLOWHEALTH, S.L.
on April, 4th of 2018, and updated on June, 28 of 2021.

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*Trust in our Company and its products is our most precious asset.
We can only achieve and sustain it by maintaining integrity and honesty. For
that, it is necessary that all of us know and comply with the applicable legal
regulations and internal policies.
This Code of Conduct is the ground of our actions.*

1.- OBJECT

We are FOLLOWHEALTH S.L. (hereinafter “HumanITcare” or “Company”), a company specialized in development of telemedicine programs, advanced telemonitoring and provision of technical support services. Our mission is to be a world benchmark for digital products for the follow-up, monitoring and innovation of patient's life quality.

Our common values determine how we perform our duties, how we make decisions and how we behave with each other and with third parties.

The purpose of this Code of Conduct is to embody these values in order to consolidate business conduct accepted and respected by all employees, managers and administrators and by all those who want to interact with HumanITcare (hereinafter “people”).

We intend that all of whom we are part of the Company have a culture of compliance and that this Code works as a binding guideline for our actions.

This Code of Conduct is the starting point of the Company's ethics and compliance model, it aims to guide relations between employees; their actions with clients, stockholders, suppliers and external collaborators; and relations with private and public institutions and with society in general.

HumanITcare's actions are based on respect for the following values: honesty, leadership, excellence, concern for the environment, social responsibility, long-term focus, financial strength, customer orientation, innovation and caring for people.

By accepting and respecting these guiding principles, we will make HumanITcare not only synonymous with excellence of its products and services, but also of transparency and integrity.

2.- SCOPE

Is decisive for the success of our Company that all employees, from the members of the Administrative Body to each of the staff members, behave honestly, with integrity and ethically correct.

In this context, HumanITcare's senior management has a special responsibility: it must serve as an example in the Company, it must teach and transfer the culture of compliance, it must prevent any conduct contrary to the law, it must protect its employees and it must act with integrity both internally and externally.

In this sense, the obligation to comply with the Code of Conduct of all of us who form HumanITcare, will be represented by our signature as a sign of knowledge and acceptance, either at the time of entering the company or after each one of its updates.

3.- COMPLIANCE

The people of HumanITcare declare to comply with national and international legal provisions. This means that we never participate in activities that involve embezzlement, fraud, misappropriation, extortion, theft or any other property damage done, knowingly, to our clients or third parties.

Non-compliance with the Code of Conduct can cause considerable damages, not only to our Company, but also to us as employees, our business partners and other interested parties.

We do not tolerate breaches of the Code of Conduct.

HumanITcare applies the principle of propel control to promote compliance with internal and external regulations and to prevent, detect and eradicate irregular or contrary conducts.

By propel control, we understand, among others, to analyze and manage risks; define responsibilities and expected behaviors; allocate resources to training employees and managers; and have processes and controls in place to confirm and evaluate compliance and the ethical culture of the company, as well as to notify, evaluate and respond to potential misconduct.

4.- STANDARDS AND GUIDING PRINCIPLES

The Company assumes as primary behavioral guidelines, among others, the Universal Declaration of Human Rights, the Declaration on the elimination of violence against Women, the Declaration on Fundamental Principles and Rights at Work, the OCDE Guidelines for Multinational Enterprises and the United Nations Global Pact.

HumanITcare aims that all its relationships and those of its people comply with the following principles:

- Comply with national and international laws.
- Respect human rights and public freedoms, contribute to the preservation of the natural environment and collaborate with the development and well-being of the communities.
- Promote honesty, fairness, truthfulness, compliance with commitments, free competition and transparency.
- Provide good working conditions, respecting labor rights.

- Contribute to social and economic development in the countries where it operates through innovation, technological development, an efficient and responsible use of resources, maintaining a responsible and upright behavior.

5.- CORPORATE VALUES

HumanITcare is firmly committed to innovation, research and science for sustainable development.

The management and the business model are based on the following values:

- Legality: each of the actions carried out by the company must be within the law and carried out with the intention of compliance, which guarantees the safety of its actions and reduces risks.
- Integrity: operate honestly and consistently in all the actions carried out both within the organization itself and in the communities in which it is present;
- Professional rigour: involvement and dedication to service in all the activities carried out by the company are essential for the success of the organization;
- Reliability: discretion and prudence in relation to stakeholders, something essential to establish bonds of trust.
- Quality: excellence is embodied in all the products and services that the company offers.

6.- GUIDELINES OF CONDUCT

6.1.- Respect for legality and ethical values

HumanITcare is committed in developing its activities in accordance with current legislation in each of the places where they are carried out, with a high ethical behavior and adopting, when appropriate, the best national and international practices.

All the people who make up the Company must comply with the laws in force in the countries where our activity takes place and we try to ensure that all our actions are carried out not only within a framework of respect for Positive Law but also for all unwritten regulations.

Likewise, we avoid any conduct that, even without violating the law, could harm HumanITcare's reputation and negatively affect its interests.

The people of HumanITcare declare to know the laws that regulate our work, and in case of doubt we will request, where appropriate, the precise information through our superior or the corresponding authorities.

6.2.- Integrity, diversity and equality

We do not discriminate anyone and we do not tolerate any discrimination based on ethnicity or nationality, gender, religion, philosophy, age, disability, sexual orientation, skin color, political orientation, social origin or for any other aspect protected by law. .

This principle is contemplated and expressly declared in the different policies of the Company (hiring, selection, training, performance measurement, promotion, compensation, working conditions, conciliation, prevention of harassment, etc.).

All the people of the Company are committed to observing fair practices and that they comply with these principles with clients, suppliers, other companies, as well as the rest of the HumanITcare workers.

At HumanITcare, we promote companionship with respect, under a collaborative, diverse and fraternal spirit. In this way we achieve the highest level of productivity, competitiveness, innovative capacity, creativity, efficiency and, above all, we promote the best human relationships.

We practice diversity, actively support integration and create an environment that promotes the individuality of each person in the interest of the Company.

As a principle, the selection, hiring and promotion of our employees is based on their qualifications and skills.

6.3.- Commitment to Human Rights

At HumanITcare we respect, protect and promote current provisions regarding the protection of human and childhood rights as fundamental and universal premises. We reject any type of child exploitation, forced or compulsory labor, as well as any type of modern slavery and human trafficking. This applies not only with regard to collaboration within our Company, but also, of course, with regard to the conduct of-and towards our business partners.

6.4.- Loyalty and Conflicts of Interests

A potential conflict of interest exists if the personal interests of one of our employees or their related persons conflict or may conflict with the

interests of HumanITcare. Said conflict of interest may arise, especially, due to the performance of secondary professional activities. The Company may be harmed if an employee puts his or her personal interests before those of HumanITcare .

At HumanITcare we respect the personal interests and private lives of our colleagues, however, we consider it essential to avoid any conflict, or appearance of conflict, between private and business interests.

All our decisions are made exclusively on objective criteria and we are not influenced by personal interests or relationships. In this sense, if a conflict of interest arises, whether real or apparent, it must be disclosed to the superior or to the human resources department so that a solution can be reached that does not harm the interests of the Company.

All members of the Company have a duty to safeguard the reputation of the company and strengthen its image and good name.

Any employee, before committing to act as a director, manager, consultant or advisor to any other business organization must notify their immediate supervisor.

6.5.-Fight against bribery, fraud and corruption

HumanITcare is committed to conducting business with integrity, avoiding any form of corruption and complying with applicable anti-bribery and anti-corruption regulations.

All the Company's people must comply with the Anti-Corruption Policy, periodically, the company will evaluate the content of the internal

regulations on the matter to ensure that they are aligned with the best national and international practices.

HumanITcare declares itself against influencing the will of people outside the Company to obtain any benefit through the use of unethical practices. Nor will it allow other persons or entities to use these practices with its employees.

HumanITcare people must act in accordance with applicable laws and, in no case, may they resort to or tolerate bribes from third parties towards the Company, its employees or vice versa, they may not offer or accept gifts and hospitality to or from public officials or other third parties that may affect the impartiality of any of the parties, influence a business decision or lead to a poor performance of professional duty.

HumanITcare people may not make contributions on behalf of the company for political purposes contrary to the law, obtain favorable treatment using sponsorships or donations as a means to achieve it, use the company's business relationships and contacts for their own benefit or that of a third party, or establish business relationships with third parties without complying with the minimum due diligence duties in the knowledge of third parties.

The Company does not use misleading or falsified information with the aim of obtaining subsidies or any other type of aid or advantages and ensures that the subsidies and other funds of which the Company is the beneficiary are used exclusively and diligently for the purpose for which they were granted.

Additionally, only the persons of the Company authorized to do so may negotiate contracts, both in the public and in the private sector. The

Company periodically reviews its accounting and internal control elements to ensure that they cannot hide improper payments or those that are contrary to what is provided in this Code of Conduct.

6.6.- Law of abroad corrupt practices. Political contributions

In addition to the provisions of this Code of Conduct and other concordant HumanITcare policies, employees who work with any private entity or of the Public Administration of any country have the obligation to know, understand and observe the applicable laws and regulations. In the event that a body of the national, state or local Administration has adopted a more restrictive policy than that of the Company in this matter, the people of HumanITcare must comply with said more restrictive policy.

The Company is subject to laws of global scope, notably the United States Foreign Corrupt Practices Act ("FCPA") and the British Bribery Act of 2010, which are the reference laws in this field. The FCPA makes it a crime for companies and their directors, counsels, employees and representatives to pay, promise, offer or authorize the payment of anything of value to any foreign official, foreign political party, person in charge of foreign political parties, candidates for political office foreigners or heads of international public organizations, in order to get or keep business. Payments of this nature are directly contrary to HumanITcare policy, even when refusal to make them may result to the Company losing a business opportunity.

The FCPA also requires companies to maintain accurate books, records, and accounts and to design a system of internal accounting controls that is sufficient to reasonably ensure that, among other

things, the company's books and files accurately reflect reasonably detailed, the operations and disposals of its assets.

The Company will not deliver or encourage anyone to deliver any kind of incentive to any employee of the Administration or the private sector, or to any supplier subject to a government or non-government contract or subcontract in order to obtain any contract or commercial advantage.

6.7.- Gifts, hospitality and invitations

Gifts and entertainment may be common practices in some jurisdictions, sectors and countries to strengthen business relationships.

Our position is the same in all geography: no gift or favor should be accepted or provided, nor any leisure activity, if it obliges or seems to oblige the person who receives it, even though it is not prohibited. It is never allowed to receive or deliver gifts in cash or highly liquid assets.

HumanITcare individuals may accept or grant gifts, favors, and entertainment only if they comply with the following criteria:

- If they are consistent with existing business guidelines;
- If they cannot be interpreted as bribery or improper influence;
- If they do not violate the values or business ethics of the Company in any other way;
- If they do not violate the law or the policy of the other party;
- If they are consistent with the usual commercial practices of the country or sector;
- If they are reasonably related to business relationships.

For the correct fulfillment of these requirements, a prior authorization is also provided for the acceptance or granting of:

- Gifts whose value exceeds €50 or equivalent;
- Invitations to any type of congress, business trip or event of any other nature paid by the promoter.

Any gift that does not meet the criteria listed above must be returned immediately. In the event that its return is not possible, it will be delivered to the legal department which will use it for social purposes. In this sense, the legal department must provide supporting documentation for its destination.

In addition, the following practices are established to be followed for the hospitality expenses offered:

- In no case include cash as part of the hospitality;
- Do not make cash advances;
- Hospitality expenses must be paid directly by HumanITcare and not by third parties;
- Whenever the situation allows, expenses (hotels, restaurants) will be paid directly, rather than reimbursed to the recipient. In the event of reimbursement, maximum diligence will be kept in preserving the appropriate support;
- The nature of the event/invitation will be properly documented, either in the settlement of expenses, or in the accounting of the respective invoices;
- The extension of an invitation to companions must be justified by the nature of the event;
- The invitation cannot be conditioned on the performance of any action for the benefit of the Company;

- Send the communications and/or invitations to the business/institutional management and not to the personal;

Always, in case of doubt, the legal department should be consulted.

6.8.- Money laundering and prevention of terrorism

HumanITcare applies the greatest rigor to prevent and avoid money laundering from criminal or illicit activities, and has internal control policies and procedures for its prevention, detection and, where appropriate, eradication.

All the people of the Company must comply with the applicable legal provisions and pay special attention to those cases in which there are indications of lack of integrity of the people or entities with which they have commercial relations, such as, among others, payments that are unusual attending the nature of the transaction, payments made to or by third parties not mentioned with the contract, payments to persons or entities resident in tax havens or to bank accounts opened in offices located in tax havens, payments to entities in which it is not possible to identify the partners or ultimate beneficiaries, extraordinary payments not provided for in the contracts.

Professionals must inform through their hierarchical superiors in case of any doubt in this matter.

6.9.- Defense of Competition

All HumanITcare people must act in full compliance with applicable Competition laws to ensure that the Company maintains the trust of clients and authorities, to protect its business from any breach and the liability that it entails and thus increase and maintain its reputation.

All HumanITcare employees must compete fairly in the marketplace, without misleading the company's activity, and without admitting deceptive, fraudulent or malicious practices or conduct that represent an advantage in the market.

6.10.- Security and health at work

HumanITcare promotes the adoption of health and safety policies at work and adopts the preventive measures established in the current legislation of each country. The Company provides its employees and collaborating companies with the necessary guidance and resources in order to carry out their activities in a safe and healthy way.

Likewise, it promotes the application of its health and safety regulations and policies at work by the collaborating companies and suppliers with which it operates.

All HumanITcare people must know and comply with the rules for the protection of health and safety at work and ensure the safety of themselves, other employees, clients, suppliers, collaborators and, in general, of all people who may be seen affected by the development of their activities.

6.11.- Confidentiality and information treatment

Information regarding HumanITcare or its stakeholders (employees, customers and suppliers) that is not public is considered confidential.

In case of any doubt about the nature of the information, employees must consider it as reserved until they are indicated otherwise. The duty of confidentiality will subsist even when the employment relationship has ended.

All the information and knowledge that is generated within the scope of the Company is property of HumanITcare in the terms referred to in the current legislation.

This information should be used to meet the business objectives exclusively, not sharing it with anyone outside the company, including family and friends, nor with any other worker who does not need to have it to fulfill their duties.

In general, it is against this Code of Conduct to share any type of information whose disclosure or publicity may affect the interests of the Company.

All public communications and information given to the media that affect the Company must have the prior approval of the administrative body.

It is against this Code of Conduct, as well as illegal, to buy, sell, trade or otherwise participate in operations that affect the values of HumanITcare, when in possession of substantial information related to the company that has not been communicated to the general public and that when it is communicated it may have an impact on the market price of the organization's securities.

It is also against the Code and illegal to buy, sell, trade or otherwise participate in operations that affect the securities of any other company when in possession of similar material information that is not public regarding said company. All doubts regarding the legality of carrying out a transaction with HumanITcare securities (or those of another company) should be addressed to the administration body.

6.12.- Personal data protection

All HumanITcare people must act in full compliance with Data Protection laws to ensure that the Company maintains the trust of customers and authorities, to protect its business from any breach and the responsibility that it entails and to increase and maintain its good reputation.

Most countries and jurisdictions have mandatory regulations or guidelines on market practices regarding the possession and use by a company of personal data of natural persons.

The prohibited behaviors to employees, among others, are:

- Possession or collection of data without the consent or with opposition of the affected party;
- Non-consensual data transfer;
- Personal data manipulation;
- Disclosure or publication of data out of context; and
- Creation of user profiles based on previously obtained data.

Lacks of Data Protection laws can have severe and personal consequences. In most countries, companies found guilty of such violations may be subject to criminal and civil liability.

6.13.- Use and protection of goods

The Company makes available to its employees the necessary resources for the development of their professional activity.

People must use company goods responsibly, appropriately and with the relevant authorizations, in the environment of their professional

activity. Likewise, they must protect and preserve them from any inappropriate use that could be detrimental to the interests of the company.

It is forbidden to sell, transmit, assign or hide any property owned by the Company in order to evade the fulfillment of responsibilities and commitments towards third parties.

HumanITcare computer systems and equipment must be for professional use only. However, in those cases in which these resources are used exceptionally for personal purposes, their use must be minimal, reasonable, adequate and in accordance with the principle of good contractual faith. All the people of the Company must know and accept the rules established by the company.

HumanITcare technology resources cannot be used to:

- Issue personal opinions on behalf of the group or access forums or social networks for the same purpose, unless expressly consented to that effect.
- Store or distribute, or visit Internet sites with inappropriate material that violates human rights, privacy, honor, self-image, religious freedom; or against the dignity of people such as racism, xenophobia, apology for violence or terrorism, and pornographic material or sexist apology.
- Use, introduce, download, copy, transmit, reproduce, distribute or store any type of software, edited work or invention protected by intellectual or industrial property without the corresponding license or authorization.
- Carry out or participate in mass emails with chain letters, jokes, or inappropriate images.

6.14.- Relations with clients, suppliers, contractors, partners and collaborators

HumanITcare assumes, leads and promotes the commitment to the quality of its products and services, and acts under recognized national and international best practices.

All the people of the Company must take care of relationships with clients, acting with integrity and aiming to achieve the highest levels of quality and excellence in the provision of services, seeking the development of long-term relationships based on trust and mutual respect.

Likewise, the Company considers its contractors, suppliers, partners and collaborating companies indispensable for the achievement of its objectives of growth and improvement of service quality, and seeks to establish relationships with them based on trust, mutual benefit and respect for free competition.

HumanITcare is committed to convey its ethical principles to the third parties with whom it collaborates.

The Company promotes hiring of third parties that certify good ethical, social and environmental practices. It also includes clauses in contracts related to this Code of Conduct in order to transfer its position regarding the prevention of irregular or illegal conduct and to ensure adequate social and environmental performance by the counterpart.

6.15.- Respect for the environment

Preservation and respect for the environment is one of HumanITcare's basic pillars of action, which is manifested in compliance with the best

environmental practices in all its activities, through the prevention and minimization of adverse environmental impacts and conservation of natural resources.

6.16.- Development of other activities

HumanITcare employees and managers may carry out other activities outside the company, as long as:

- They do not have an exclusivity contract;
- The activities they carry out do not directly compete with any activity carried out by the Company; and
- The activities are not detrimental to the development of their functions within HumanITcare.

7.- MONITORING AND CONTROL

The first point of contact for any query or doubt regarding the use, scope or application of this Code of Conduct or a suspected violation, is our immediate superior, or the Company's legal department, which email is: legal@humanitcare.com

Likewise, the legal department will be responsible for monitoring and updating the provisions contained herein. Whenever an update of the conditions of the Code of Conduct is carried out, all HumanITcare people will be notified who must endorse it and commit to comply.

8.- COMMUNICATION

The people of HumanITcare must try to have a direct and two-way communication with our supervisors, directors and corresponding colleagues to communicate and deal with any known or suspected

criminal activity that affects both the activity of the Company and its employees. If, during the course of your employment relationship, you become aware of any activity or behavior in this regard, we must report such violations of the laws, voluntarily assumed standards or of this Code of Conduct, following the protocol established for that purpose. Communication of such activity will not bring the employee under any disciplinary action unless the report is deliberately false. All reports will be treated confidentially and will be fully investigated.

This Code of Conduct requires immediate and internal communication of any breaches, as well as any illegal conduct.

9.- COMMUNICATION CHANNEL

The Communication Channel is a fundamental part of our commitment with the fight against corruption and all those practices that contravene the laws or regulations assumed voluntarily, since it constitutes the mechanism through which all the Company's stakeholders and individuals can anonymously report all irregular behaviors that they detect during the development of their professional work.

- Internally: available for all employees to communicate complaints, claims or doubts related to infractions of the law or breaches of the Code of Conduct.
- Externally: designed so that anyone outside the Company can report irregularities, fraudulent acts or acts contrary to the Code of Conduct.

10.- BREACH

Serious breach of the Code of Conduct could result in disciplinary action, including the end of the employment relationship, depending on the nature and severity of the offense.

The Code of Conduct will be made available to all HumanITcare employees and will remain posted on the company's website (<https://humanitcare.com/>).

11.- VALIDITY

This Code of Conduct enters into force on April 4, 2018 after its approval by the Administrative Body and will remain in force until its update, revision or derogation is approved.

It will be reviewed and updated with the periodicity indicated by the Management Body and, if necessary annually, taking into account any type of proposal or suggestion made by employees or stakeholders, and taking into account the commitments regarding corporate integrity, transparency, social responsibility and good governance.

That is why, as an employee, I sign this document as I have understood the Code of Conduct and policies of FOLLOWHEALTH S.L.