

## WINGS MOBILE CODE OF ETHICS

**WINGS MOBILE SPAIN, S.L.U.**, has developed its work within the values of Honesty, Respect, Compliance, Commitment, Responsibility and Knowledge, and it is these same values on the basis of which the Code of Ethics is prepared, whose objective is to strengthen trust of our collaborators, clients, suppliers and investors, maintaining an environment of transparency and responsibility.

Our Code of Ethics was developed by the company, it establishes a frame of reference based on the mission, values and principles of the company.

It is a commitment and an obligation of all the members of **WINGS MOBILE** to comply with all the guidelines provided in this Code in each of the activities that are carried out daily, carrying out their work with prudence, professional judgment and ethical commitment to the entrusted work.

It is the responsibility of the human resources area to disseminate this code at all levels of the organization, for which tools such as email must be used, as well as periodically assessing its knowledge.

Organizations that enter into a contract with our organization, as well as their collaborators, must relate to our company in accordance with the standards of this code.

### FOUNDATIONS

Our mission and vision:

### MISSION

Positive impact on the lives of millions of people.

### VIEW

Create the least expensive and most profitable trade for you.

### Our principles:

- **Transparency:** all our collaborators must carry out their duties in the field of transparency, without carrying out actions with bad intentions towards the members of the organization or towards third parts.
- **Respect:** all the collaborators of **WINGS MOBILE SPAIN, S.L.U.** carry out their functions and interactions with the other members of the organization and with

third parts, maintaining respect for the dignity of the person and differences of opinion.

- **Integrity:** the collaborators of **WINGS MOBILE SPAIN, S.L.U.** must carry out all their activities with integrity, therefore, it is expected of them rectitude, honesty, dignity and sincerity in all circumstances.
- **Honesty:** develop all relationships with integrity, ethics and responsibility.
- **Social responsibility:** being responsible for the development of activities and work, responding and taking care of the interests of the communities and the environments in which they are carried out.

## **OBJECTIVES OF THE CODE OF ETHICS**

- Define our policies and commitments as a company.
- Specify the definition and ethical expectations of **WINGS MOBILE SPAIN, S.L.U.** regarding corporate conduct and transparency towards all its stakeholders (shareholders, customers, suppliers, companies, state).
- Ensure the protection of the legitimate business interests of **WINGS MOBILE SPAIN, S.L.U.** including business opportunities, resources and confidential information.
- Make sure that the content and strategy of all our communications and product promotion for our customers are honest, ethical and clearly understandable.
- Eliminate any illegal or inappropriate behavior.

## **COMPANY PERSONNEL**

Normative compliance:

The organization and, therefore, its collaborators respect the laws, regulations and regulatory standards of each of the geographic areas in which **WINGS MOBILE SPAIN, S.L.U.** is present, so officials must promote their knowledge, without representing knowledge. Detailed rules, but general knowledge.

Regardless of the position or position developed by the employee, appropriate and correct behavior is expected, consistent with the principles and values of our company and that contributes to the achievement of the mission and objectives.

Under no circumstances is the provision of benefits or bribes to government officials permitted to achieve the organization's objectives.

Commitments (duties) and responsibilities

All **WINGS MOBILE SPAIN, S.L.U.** collaborators must:

- Promote an environment of mutual respect and respect the relevant laws, policies, rules and regulations.
- Be promoters of the values and principles of the company **WINGS MOBILE SPAIN, S.L.U.** and provide an example of the behaviors and practices promoted in this Code.
- Certify annually that labor actions comply with the provisions of the Code.
- Request the pertinent clarifications in case of doubts about possible situations that violate the Code.
- Promote teamwork and support between the units and areas of the organization, to share knowledge, experiences and the best of themselves.
- Promote healthy competition among employees, allowing professional growth and without affecting the results of the organization.
- Communicate in a timely and responsible way ideas, concerns and / or constructive comments for the company, which make the processes more efficient and effective.
- Avoid unfounded judgments of other people.
- Ask for feedback, know how to listen to it and use it as a means of improvement.
- Provide constructive feedback when appropriate, and with honesty and objectivity, describe rather than evaluate and suggest alternatives for improvement.
- Acknowledge the good work of others and express it in a timely manner.
- Respect the assigned responsibilities in a coherent, honest and responsible manner.
- Be responsible for training and professional development and take advantage of the development opportunities offered by the company. (Training).
- Respect the health and safety rules and regulations.

- Project with a good example, the image of the company, inside and outside the structures. Promote open communication and appropriate channels for effective feedback. Collaborate in the development of audits and / or fraud investigations.

## **RIGHTS:**

All partners of **WINGS MOBILE SPAIN, S.L.U.** have the right to:

- The company must promote a healthy work environment in which principles and values are promoted, as well as healthy competition and professional growth.
- The company **WINGS MOBILE SPAIN, S.L.U.** must protect all employees through security equipment, devices, systems and procedures.
- The company **WINGS MOBILE SPAIN, S.L.U.** must protect the environment and the health of its employees.
- Participate in training courses and training courses developed by the company.
- The company **WINGS MOBILE SPAIN, S.L.U.** must be open to receiving ideas, concerns and / or constructive comments from its collaborators, so that the processes are more efficient and effective.
- To be recognized for the excellent work done.
- The company **WINGS MOBILE SPAIN, S.L.U.** must provide constructive comments on the performance of its collaborators, so that they can improve.
- Be heard in the publications, being able to defend against the assigned charges.

## **BEHAVIORS NOT ACCEPTED:**

The following list of behaviors is a guide and is not mutually exclusive, as each **WINGS MOBILE SPAIN, S.L.U.** employee must ensure that:

- Report information that does not correspond to the reality of the operation - manipulation of financial statements.
- Illegal conservation of the organization's resources.
- Unauthorized access to the information systems of the Company's internal or external personnel. Conflict of interests
- Verbal or physical aggression between collaborators.

- Theft of elements of the company or collaborators. And the others covered by the internal labor regulations.

### **SELECTION AND CONTRACT:**

At **WINGS MOBILE SPAIN, S.L.U.**, the selection and hiring of personnel is based on the capacity, experience and knowledge of the candidates, as well as their identification with the principles and values of our company.

The selection and hiring process is carried out with respect and equality, without creating false expectations for the candidates and respecting the relevant rules and regulations.

We promote a healthy, respectful and productive work environment, which allows us to improve the skills and creativity of all our collaborators. In this sense, we promote the values and principles of the company and give priority to respecting the differences and opinions of others, thus avoiding any type of harassment or discrimination.

In case of any type of discrimination or harassment, the situation must be reported to the human resources department to carry out the respective investigations and take the necessary measures.

### **RELATIONSHIP WITH INTERESTED PARTS**

Relationship with the client.

All the collaborators of the organization and, in particular, those who carry out their work directly with the clients, must promote the presentation of the service in an environment of respect, kindness and transparency, providing timely, concrete and truthful information, according to the needs of client.

Similarly, we expect our clients to share our principles, which is why our Code is published on the website and our clients are invited to learn about the Code through this medium, in order to comply with everything established in it and in the laws. and relevant regulations. Given the above, if it is determined that a customer is involved in illegal or unethical acts that violate this Code, the business relationship must end.

### **RELATIONSHIP WITH SHAREHOLDERS**

The relationship between shareholders and management will be carried out in accordance with the parameters established in the organization's statutes.

## **RELATIONSHIP WITH SUPPLIERS**

Our company always tries to offer opportunities to all suppliers, without generating false expectations. The connection of suppliers is based on technical, economic and compliance criteria.

We promote the practice and respect of the Code, so that all suppliers can carry out their activities within the established laws and regulations, as well as respect all the agreements and commitments established in the contracts, for which we expect collaborators who represent our suppliers who are connected to our organization in accordance with the guidelines of the Code.

It is our duty, when we observe behaviors not aligned with our Code, to initiate the corresponding actions to correct this situation.

## **RELATION WITH THE COMMUNITY**

We always try to take care of the environment and promote sustainable activities, always open to the community, maintaining adequate communication and generating work and activities that seek to improve the conditions present in the communities where we have impacts with our construction and / or marketing.

## **CONFLICTS OF INTEREST**

Conflict of interest is understood as any situation in which a person puts his personal or financial interests before those of the organization. To avoid generating In situations of conflict of interest, all employees of **WINGS MOBILE SPAIN, S.L.U.** must act with honesty, ethics and loyalty, always seeking to protect the interests of the company, so the following actions are not allowed:

Connect family members with the second degree of inbreeding and the first degree of affinity.

Offer unauthorized benefits to third parts or subordinates, taking advantage of the position or position within the organization.

Participate or develop companies that compete or interfere directly or indirectly with the company. Accept benefits or income from customers, suppliers or competitors.

Take advantage of the position or position in the company to obtain personal benefits, including family or third parts

No collaborator of **WINGS MOBILE SPAIN, S.L.U.** or their relatives in the second degree of consanguinity or first degree of affinity, can be a supplier or contractor,

therefore, in case of such situation, the collaborator must immediately inform the General Management to validate information. and make a decision on whether the relationship is relevant or not.

Any questions, concerns, or complaints regarding an actual or potential conflict of interest situation should be communicated to the human resources department and general management by written communication and should be handled ethically by employees in accordance with the provisions of this code.

Collaborators who, after the entry into force of this Code of Ethics and who have a relative in relation to the company, must inform the Administrative Management.

### **BRIBERY AND EXTORTION**

We reject any act of corruption, so corruption and extortion are prohibited, either through negotiations with third parts or within the organization, or with organizations outside the law. Promising, offering and / or paying third parts is also prohibited, without respecting the authorization levels established in accordance with the organization's processes.

All activities carried out must start from the principle of transparency and respect for anti-corruption laws and regulations.

If a situation of corruption or extortion is identified, the presidency must be informed to take disciplinary measures and, if necessary, legal measures.

### **MONEY LAUNDERING**

It is prohibited to carry out any transaction to hide the true origin of the illicit funds or to show them that they have a source of legal activity. Money laundering involves illegal activities such as terrorism and / or drug trafficking, among others.

We are committed to fully complying with anti-money laundering laws and regulations, as well as implementing relevant actions to evaluate our business relationships that guarantee the integrity of the operations we carry out.

If a recycling situation is identified, the company should be informed to take disciplinary action and, if necessary, legal action.

### **GIFTS AND COURTESY**

It is prohibited to accept or make gifts or courtesies that may compromise the decision-making process in a negotiation, as well as to receive or request donations from suppliers or clients.

Whenever a customer or supplier receives a gift, it is necessary to request the authorization of the Area Manager to receive it and make the correct

registration, since it cannot compromise the integrity or objectivity of the collaborator. In no case is it possible to accept gifts above 0.5 current legal minimum wages, since they may not be in cash, nor be ostentatious and / or exclusive.

The granting of gifts and courtesies to customers or suppliers must be authorized only by the general manager.

The gift should not be given to compromise the results of a negotiation.

Gifts given must be recorded according to their accounting nature.

The granting of gifts to officials will be carried out in accordance with the provisions of the performance policy, which can be consulted with the human resources department.

## **ENVIRONMENTAL RESPONSIBILITY**

Our company **WINGS MOBILE SPAIN, S.L.U.** has as a priority the development of all its activities with respect to nature, managing the least environmental impact based on the development of our operations.

In this way, all the collaborators of **WINGS MOBILE SPAIN, S.L.U.** must demonstrate an adequate environmental behavior and comply with the relevant laws and regulations, being the responsibility of all the collaborators to report any identified environmental risk to the General Management of the Company.

## **INDUSTRIAL SAFETY AND OCCUPATIONAL HEALTH**

For **WINGS MOBILE SPAIN, S.L.U.** it is a priority to avoid any type of workplace accident and safeguard the safety and health of all our collaborators. For this reason, we are all responsible for creating safe work environments and demonstrating safety and health-oriented behaviors.

We must all be committed and responsible in reporting any health and safety risks that we identify in our workplace, as well as stopping any work that is considered risky.

It is the obligation of all our collaborators to attend the training courses and training courses offered by the company for the identification of risks in the workplace, as well as to comply with the laws, regulations and standards of safety and health.

## **CONFIDENTIAL AND PRIVILEGED INFORMATION**

All information that has not been officially published, but that is used for the development of the functions of each collaborator and that cannot be disclosed or shared with third parts, is considered confidential information, therefore, its

disclosure or unauthorized use is considered a crime, serious, which deserves a disciplinary process that also ends with dismissal for a just cause and may have civil or criminal consequences.

The following information is considered confidential and / or privileged information:

- Financial statements and economic projections.
- Customer and supplier lists.
- Elements of intellectual and industrial property.
- Architectural and / or technical drawings.
- Marketing, advertising and sales strategies, manuals and plans.
- Formats and / or digital files for monitoring and / or daily control of the activities carried out in each of the areas.
- Personal data of workers, such as address, landline and / or mobile phone.

The collaborators of **WINGS MOBILE SPAIN, S.L.U.** must administer and manage the information assigned for the development of their functions in a responsible and safe manner, as well as the information must not be disclosed to third parties without the corresponding authorization.

In case of doubts about the management of confidential or privileged information, it is necessary to consult the management.

If confidential or privileged information is provided with good cause, the nature of confidentiality needs to be reported, and third parties must sign a confidentiality pledge.

Likewise, our company **WINGS MOBILE SPAIN, S.L.U.** respects the confidential and privileged information of third parties, their intellectual and industrial property rights. All our collaborators must respect these rights, so the use of this information for the benefit of our organization is not allowed, if it has not been obtained with the express authorization of the owner.

## **RELATIONSHIP WITH OUR COMPETITORS**

We compete with transparent practices of quality and innovation of our services and / or products, and not with the development of illegal practices, for which it is prohibited to obtain from our competitors' information that has not been officially published or that has not been authorized for delivery.

Price agreements, supply manipulation and price manipulation are also considered illegal practices, therefore such practices will be sanctioned in accordance with the provisions of the law.

Therefore, any agreement signed with our competitors must have the legal approval that certifies that it does not violate the established regulation.

## **RESOURCES AND ACTIVITIES OF THE ORGANIZATION**

All the collaborators of **WINGS MOBILE SPAIN, S.L.U.** are responsible for the correct and rational use, as well as the protection of the organization's assets, promoting their safety and assistance.

The foregoing includes the use of all communication elements and tools such as the internet, intranet, telephones, computer equipment and other computer, office and technological tools.

Resource protection includes data protection, trade secrets, business plans, projects, accounting and / or salary information.

The organization's specialized teams should only be managed by officials authorized for such work.

In case of knowledge of any situation that involves the improper use of the resources and assets of the company, this situation must be reported immediately to the General Management.

## **SOCIAL NETWORKS**

The participation of all the collaborators of **WINGS MOBILE SPAIN, S.L.U.** in social networks is personal and has no relationship with **WINGS MOBILE SPAIN, S.L.U.**, however, in the event that the use of social networks is required for purposes associated with **WINGS MOBILE SPAIN, S.L.U.**, the Devi collaborator clearly identify it, have the authorization of the area manager and follow the following parameters:

Each publication must be aligned with the principles and values of the organization.

Respect the guidelines on the handling of confidential and privileged information.

Be respectful in the way you express yourself to the community.

Do not offer products or services not authorized by the organization, nor create false expectations.

The use of social networks without the express authorization of the organization will always be in the personal skills of the collaborator.

## **FINANCIAL INFORMATION ADMINISTRATION**

**WINGS MOBILE SPAIN, S.L.U.** is committed to providing its shareholders and the market with true and transparent general information about its operations, so all

employees must contribute so that financial statements, tax returns and the like reflect reality. of economic events, due to the communication of information or the application of controls at the corresponding levels.

Similarly, **WINGS MOBILE SPAIN, S.L.U.** accepts compliance with national laws on financial relations and tax information with corresponding subjects, respecting the registration, retention and preparation of financial reports in accordance with international financial reporting and other standards. Relevant guidelines.

## **OTHER PROVISIONS**

To promote an ethical culture and the practice of values and principles in the company, a mechanism has been established for the administration of this Code, which defines the following:

The organization **WINGS MOBILE SPAIN, S.L.U.** will form an Ethics Committee, which will be made up of:

- Director of Spain.
- Holding Operations Manager.
- Legal Director of the Spain.

The committee may send the invitation to external officials if it deems it necessary.

For any doubt or clarification about the guidelines registered in this code, you can request it from the administrative management.

Complaints related to code violation can be reported [www.wingsmobile.com](http://www.wingsmobile.com)

This code should be disclosed to all members of the organization, through internal communications, training and other tools to support its disclosure.

Any violation of this code will be subject to disciplinary sanctions that could even lead to dismissal for just cause.

The code must be reviewed annually by the Ethics Committee, which will approve any changes.

All employees of the organization must certify their understanding of the guidelines recorded in the Code.

The members of the Ethics Committee will be chosen by the Shareholders' Meeting. This code is complemented by other policies of the organization.

## **RESPONSIBILITY OF THE ETHICS COMMITTEE**

The responsibilities of the ethics committee are:

- Promote knowledge of the Code of Ethics and their experience in the company.
- Serve as an advisory body on facts or circumstances that may affect business ethics. Freely and objectively analyze the complaints received.
- Guide and support internal or external investigations, if necessary. Evaluate the ethical management carried out.