

1. Principles.

At Sling Supply International, S.A. we want to be a sustainable successful company and we know that success will not last if it is not based on good business practices. Therefore, we want our success to be based on the principles of:

- Responsibility.
- Professional ethics.
- Integrity.
- Honesty.
- Loyalty.
- Efficiency.

Our Code of Ethics and Conduct is an express statement of the principles, values and guidelines of conduct that should inspire and guide the behavior of the people integrated in the company in the development of their work and professional activity. These principles and values describe the behavior we expect from our managers and employees.

This Code aims to share with the people who make up the company the corporate principles that are part of the culture of good practices. To this end, we develop behavioral models that are based on the aforementioned principles, also contributing to the prevention of actions contrary to the law.

The ultimate purpose of our Code of Ethics and Conduct is to promote a responsible work environment beyond legal requirements, for all members of our business organization, from whom the highest level of ethical behavior and integrity is expected.

2. Scope.

The gestation of this code of ethics and conduct has had as its starting point the initiative of the administrative body of Sling Supply International, S.A.; However, the entire management team and all employees assume the commitment to share its implementation and make it their own, working to achieve its dynamization until its total consolidation in the business culture is achieved.

This code applies to the following persons:

- Business partners.
- The administrative body.
- The managers.
- Employees.
- Associated persons.

3. Objectives of the Code of Ethics and Conduct.

The objectives of our Code of Ethics and Conduct are the following fields of action:

- Personal responsibility.
- Compliance with Law.
- Relationships with co-workers.
- Relationships with customers and suppliers.
- Professional development and training.
- Safety and health at work.
- Environmental protection.
- Prevention of money laundering.
- Right to privacy.
- Confidentiality and use of company information.
- Use and protection of company and third-party assets.

4. We are responsible when we follow ethical principles.

The persons linked to Sling Supply International, S.A. must accept their personal responsibility for compliance with the Compliance Manual and this code. To this end, they should take the necessary time to read and understand them and to know the consequences of non-compliance.

In particular, their main duties are:

- Perform their respective duties with honesty, care, diligence, professionalism and integrity.
- Assume and fulfill the commitment to always act by doing the right thing.
- Understand their belonging to the company as their commitment to be part of a work team and that when this commitment is lacking, the team is failing.
- Always do what you promise.
- Be honest and don't look for an excuse not to be.
- Be orderly in your person and in your work.
- Do not carry out commitments or make promises of any kind, knowing that they are harming the interests of the company.
- Understand and assume that non-compliance with the rules cannot be considered as an option to consider within the framework of business risk.
- Inform the administrative body of any act of which they are aware that involves waste, fraud, abuse or corruption.

5. We comply with current legislation.

The commitment of Sling Supply International, S.A. is to be rigorous with compliance with the laws. All persons belonging to the company must act with absolute respect for current legal regulations and, in particular, must avoid criminal behavior. In particular, the following are the duties of persons subject to the compliance manual:

- Know and understand the compliance manual and company policies.
- Comply with the obligations, guidelines and prohibitions developed in the company policies.
- Make access to own or third-party computer systems with absolute respect for the law.
- Maintain the accounting and financial records of the company accurately, rigorously, completely and with absolute transparency, recording all economic transactions of the company completely and in accordance with generally accepted accounting principles and applicable accounting regulations.
- Respect the intellectual and industrial property rights of the company and third parties.
- Maintain the confidentiality and secrecy of any information (own or third parties) possessed because of the exercise of professional or work activity in the company.
- Inform management of any known breach of the law, the compliance manual and the code of ethics and conduct.
- Inform management of any risky conduct of which it is aware that has not been included in the company's policies.

6. We encourage personal relationships with co-workers.

The most valued asset of Sling Supply International, S.A. is the personal relationship of all those who are part of Sling Supply International, S.A. In such a way that achieving a good working environment is our first objective. It is only possible to appreciate the contribution of each individual if we have a good working environment, good personal relationships, good organization, good emotional health and if we act with all co-workers in accordance with the rules of courtesy and respect.

In particular, the following are the duties of persons subject to the compliance manual:

- Open, respectful, clear and sincere communication with all co-workers.
- Collaboration with co-workers and helping them achieve success in the performance of their duties.

- Mutual loyalty.
- Alignment with the company's mission.
- The spirit of teamwork, proactive attitude and accountability.
- Respect for individual differences.
- Attention to all communications issued by the company to managers and employees.
- Harassment in any form is strictly prohibited, whether face-to-face, in writing, by mail or by any other means.
- Any discrimination based on gender, race, sexual orientation, religious beliefs, political opinions, nationality, social origin, disability or any other circumstance likely to be a source of discrimination is prohibited.

7. We value the relationship with customers and suppliers.

The customer is the *raison d'être* of Sling Supply International, S.A. Meeting their needs and expectations and earning their loyalty are an essential part of meeting our growth and development objectives. Our aspiration is continued success over time and this will only be possible if our customers trust Sling Supply International, S.A. That is why we must strive to gain and maintain their trust.

The supplier is a powerful strategic partner to the extent that a response according to the quality and compliance requirements of the company is vital to achieve the standards set for the development of our products and services. Our aspiration is to maintain a relationship of trust with our suppliers. That is why we must strive to gain and maintain their trust.

Both forces are authentic intangible assets with a decisive contribution to the final objective and we are aware that their achievement and maintenance depend on our behavior. For this reason, we are committed to honesty, transparency and integrity in all relationships with customers or suppliers as a method to achieve and maintain the value of these intangible assets.

We are committed to the responsibility of achieving the highest levels of quality in our products and services.

We refuse to make improper charges or payments and any payment or collection with cash, except for the attention of minor expenses that are usually paid in cash and in cash.

In certain circumstances, the exchange of restricted and in-kind commercial favors might be considered appropriate. However, we do not seek to unduly influence the decisions of our customers or suppliers by offering commercial favors. For this reason, it is forbidden to accept or offer gifts, gifts, favors or attention, except in those situations in which it is within the usual limits of courtesy and provided that they do not go against the applicable laws.

8. We promote professional development and training.

Sling Supply International, S.A. values the professional growth of all its employees. For this reason, it undertakes to provide the means to contribute to the learning, training and updating of the knowledge and skills of all of them. For their part, all employees and managers will participate in all training programs to the extent required and will strive to get the most out of them.

9. We ensure safety and health at work.

Sling Supply International, S.A. is committed to complying with applicable laws and regulations with the protection of safety and health in the workplace. We promote and protect the health and safety of our employees and encourage people in our company who have responsibilities in areas subject to occupational safety and health laws to be aware of and apply these rigorously and punctually. It is not allowed to act irresponsibly putting at risk the safety of our colleagues and the facilities and equipment of the company.

Sling Supply International, S.A. is committed to providing and maintaining a safe and drug-free work environment that encourages productivity and the best service to our customers.

Understanding that the consumption of alcohol or any narcotic substance, legal or illegal, may interfere with our ability to fulfill professional responsibilities and commitments, its use is prohibited to any extent in the place and hours of work.

10. We want to protect the environment.

Sling Supply International, S.A. is committed to complying with laws and regulations relevant to the protection of the environment. We promote efficiency in the consumption of resources and the prevention of environmental pollution.

All the people who make up Sling Supply International, S.A. have the duty and responsibility to comply with environmental laws and to respect the environment wherever they work.

11. We comply with anti-money laundering laws.

Our commitment to fair play, honesty and transparency includes complying with all anti-money laundering and anti-money laundering laws. All of us who are part of the company must learn to recognize the first warning signs that may be customers who resist providing complete information or who insist on always paying with cash.

Any suspicion detected in this area and any customer behaviour aimed at making payments with cash must be immediately reported to the administrative body.

12. We value mutual respect and privacy.

The way of using the personal information existing in the files and equipment of the company can generate undesirable and negative results, to the extent that it can affect the dynamics of the company and the image of people. That is why it is urged to respect the privacy of the personal information of partners, managers, employees, customers and suppliers and to protect the confidentiality of personal records that must remain restricted in the systems and equipment exclusively to those who have the functional need to know and treat them. These systems and equipment must be used for professional purposes. However, Sling Supply International, S.A. understands the need for some limited and occasional use for personal purposes. For this reason, it is allowed to make use of these by using good judgment.

Keep in mind that if the company is immersed in a judicial procedure or is subject to investigation, its communications may have to be delivered to third parties. For this reason, employees can not expect any privacy rights with their personal communications made from the means owned by the company, without prejudice to observing at all times the legal limitations in this regard.

Subject to the provisions of the current legal system, the company may urge the supervision of the use of electronic mail and the internet by each employee, on the understanding that all communications made with company means will be treated as work information; Therefore, it can be seen, monitored and retrieved by the company.

13. We protect confidential information.

We consider information as an intangible asset of great value. Observing a behavior of absolute confidentiality with all the information available in the exercise of work, whether it is its own or that of third companies, is an essential commitment of all persons subject to the compliance manual.

The improper use or inappropriate disclosure of your own or a third party's information may harm the company. Therefore, any information that employees receive in relation to their work, from any own source or from third parties, should be considered confidential and secret information.

In particular, the following is considered confidential and secret information, own or third parties:

- Work processes.

- Production methods.
- Marketing methods.
- The rules for setting prices.
- Operational or strategic plans.
- Business plans.
- Business projects.
- Economic and financial information.
- Lists of customers and suppliers.
- Lists of employees and partners.
- Information on human resources, salaries, etc.
- Contracts with third parties.
- Legal information.
- Software and computer programs.
- Internal communications.

The disclosure, by any means, of any information considered confidential and any other information whose transmission may infer damage to the company or to third parties is prohibited. Any person subject to the compliance manual must sign a confidentiality agreement.

14. We protect the assets of the company.

The company strives to give its employees the necessary means for the development of their work. The custody and preservation of the assets of the company is the responsibility of all members of the company and it is their duty to use them carefully to avoid their deterioration, loss or theft.

The following are assets of the company:

- Buildings and movable property.
- Machinery, facilities and equipment.
- Technology, equipment and computer systems.
- Telephones, photocopiers and fax.
- Books and databases.
- Office supplies.
- Vehicles.
- Intellectual or industrial property.
- The sensitive information of the company.

The decisions that result from the code of ethics and conduct are often complex. When faced with a situation or decision and you're not sure what's right, ask yourself the following questions:

- Do I know all the information needed to make the decision?
- Have I considered the different options available to me?
- Is this action legal?
- Is this action ethical?
- Does the decision conform to what is regulated in the Company Policies and the Code of Ethics?
- How will this decision affect the company, customers, employees and partners?
- How will others think of my decision?
- How would I feel if my decision were made public?