COMPLIANCE POLICY

1. Object

The purpose of this Blendhub Compliance Policy (hereinafter "BLENDHUB" or "the Organization") is to declare the firm commitment of BLENDHUB, as well as its Administrators and Senior Management, with Regulatory Compliance or Compliance.

BLENDHUB expresses that it is not enough to comply with the different applicable regulations, whether internal or external, but that the commitment extends to the promotion of a true culture of regulatory compliance with the Organization's daily activities, regardless of the person, position or location.

BLENDHUB establishes zero tolerance for any criminal conduct that is contrary to the rules, values and principles contained in the Code of Ethics and Conduct or any other internal regulations.

2. Area of application

This document is applicable to all members of BLENDHUB, including the companies directly or indirectly controlled by it, and regardless of the name of the company or location. Therefore, this policy is applicable to:

I. Administrators and Members of Advisory Board of the companies that form part of the Group.
II. Managers and middle managers.
III. Staff, whether self-employed or employed by others, who provide their services in the name and on behalf of BLENDHUB, regardless of the type of contract or its duration.

3. Objectives of the Criminal Risk Prevention Model

BLENDHUB has carried out an identification and analysis of its main criminal risks, as well as the controls established to prevent, avoid and react to them. A Criminal Risk Prevention Model (CRPM) has been established as a reflection of the Organization's commitment to preventing crimes and the cultural transmission towards regulatory compliance, as well as a series of unalterable and binding values and principles compliance for all BLENDHUB members. The main objectives are to:

- Avoid and prevent the commission of crimes, as well as any other conduct considered illegal, immoral or contrary to the values of BLENDHUB.
- Identify, control and mitigate non-compliance risks.
- Promote training and internal awareness.
- Promote communication, transparency and the use of Compliance tools such as the Ethics Line.
- Contribute to developing the business with absolute respect for the policies, procedures, protocols and any applicable internal regulations.

4. Commitments for the prevention of criminal risks

For the Criminal Risk Prevention Model to be effective, all BLENDHUB members must commit to complying with various responsibilities and obligations, including:

- *Commitment to act with integrity and honesty, always in accordance with current legislation and BLENDHUB's internal regulations.*
- *Commitment to assume the rules, values and principles of the Code of Ethics and Conduct as our own, as well as apply them in the day-to-day work and professional activity.*
- *Commitment to report any criminal, illegal or immoral conduct of which one is aware, mainly using the BLENDHUB ethics line.*
- *Commitment to contribute to the development, supervision and constant improvement of the Criminal Risk Prevention Model.*
- *Commitment to train and be aware of the Compliance risks involved in our daily activity at BLENDHUB.*

5. Safety and Compliance Committee

BLENDHUB's Security and Compliance Committee is ultimately responsible for the surveillance and control of criminal risks that may affect the Company in its activity, for which it is trained to create, approve and implement all types of measures. , including the creation of internal regulations. It is responsible for approving the bases, the control instruments and the mechanisms necessary for efficient coordination that allows setting priorities in Safety and Compliance, being obliged to be a benchmark and be directly involved in the promotion of all behaviors that reflect a culture of Security and Regulatory Compliance, with the objective that the entire Company achieves the commitment of said culture.

The Security and Compliance Committee will carry out whatever actions are necessary to ensure that Security and Compliance measures play a fundamental role for the development of the business, incorporating it in all areas and countries of the Company and focusing on those areas that may be more relevant or present greater risk, from the point of view of Security and Compliance. Thus, minimizing the possible sources of risk and impact that may affect the development of the proposed objectives.

This Committee is made up of specific and relevant people, internal or external to the Company, for decision-making on the necessary measures to implement or solve. Additionally, and depending on what is discussed in the committee, anyone considered relevant may be invited to discuss the actions to be carried out.

6. Ethics Line

BLENDHUB makes available to its employees, managers, temporary staff, interns, suppliers, clients and other interested third parties, an Ethics Line/Complaints (Whistleblower) Channel to communicate confidentially, through a website, those potentially irregular activities and behaviors that may imply a breach of the Code of Ethics and Conduct, of the different Corporate Policies or of the rest of the internal regulations of BLENDHUB, and/or those conducts that may lead to the commission of a criminal offense.

Communications can be anonymous, if desired, the inclusion of the complainant's personal data is not mandatory. Under no circumstances will any type of retaliation be accepted against anyone who communicates something in good faith.

The responsibility of the Ethics Line corresponds to BLENDHUB, through the Safety and Compliance Committee, which outsources the management of the Line.

The Ethics Line is managed by an external, independent company specialized in the management of complaints, Compliance and Criminal Law; and provides the platform via the web. This external company is also in charge of interacting with the complainant and with the BLENDHUB Security and Compliance Committee throughout the management of the complaint. Likewise, it guarantees the confidentiality of communications and the preservation of anonymity (in the case of anonymous complaints).

BLENDHUB has a Protocol for the Operation and Management of the Ethics Line that regulates the operating rules of the organization's complaints channel, defining the procedure for processing complaints, the legal status of complainant and accused, as well as the functions and responsibilities of each of the bodies involved in its management.

7. Disciplinary regime

Any person linked to BLENDHUB has the obligation to comply with and respect all the policies, procedures, processes and any other internal regulations that are applicable to them in the development of their activity and their functions.

BLENDHUB ensures the proper application of disciplinary measures and their proportionality with respect to the infringement of the applicable regulations. In the same way, it will impose disciplinary measures in relation to those conducts that contribute to prevent or hinder the discovery of illegal conduct, as well as the infringement of the duty to adequately report internally any breaches that may have been detected.

In the event of a breach of the Regulatory Compliance Program being detected by any of the Subject Persons, the Administrator, in coordination, as the case may be, with the Security and Compliance Committee and the Human Resources department or the corresponding department, will promote the application of the disciplinary measures that are pertinent in each case.

In order to adequately penalize violations of the content and guidelines of the Code of Ethics & Conduct, Criminal Risk Prevention Model, BLENDHUB's Internal Disciplinary System and the labor regulations in force at the time.

8. Review and continuous improvement

The BLENDHUB Criminal Risk Prevention Model is periodically reviewed to adapt it to the new circumstances and context, both internal and external, detect and correct possible errors or gaps in the Model and apply the corresponding improvement measures.

The Model review process must be guided by the Security and Compliance Committee.

9. Communication

BLENDHUB places special emphasis on the effective communication and promotion of all activities and documents related to the Criminal Risk Prevention Model. The implementation of any measure for the prevention of criminal risks is as important as its subsequent knowledge by all those affected and its proper internalization.

These communication and promotional activities will be extended to people outside the Organization when necessary or convenient.

This Policy will be communicated and promoted among all BLENDHUB members. Likewise, it will be published on the corporate website.

10. Approval and entry into force

This Compliance Policy will enter into force from its approval by the BLENDHUB Administration Board.