

Code of Ethics and Conduct

INFORMACIÓN DEL DOCUMENTO			
Version	**Date**	**Reason for change**	**Approved by**
0.0	October 2026	• Inclusion of the Code from the former database and assignment of a new document code following its relocation to the internal portal, changing from Revision 3 to Revision 0. • Update of formats and corporate visual identity (logos). • Adaptation of the content to use inclusive language. • Replacement of the email address ethicsline@blendhub.com with compliance@blendhub.com. • Replacement of the Security and Compliance Committee with the Compliance Committee. Update of the Committee's functions in Section 4. • Update of Section 10.4 on confidentiality and data protection to include references to the responsible use of artificial intelligence systems and the applicable regulations in this area. Inclusion of references to the protection of intellectual and industrial	Compliance Committee

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		property. • Creation of Section 10.8 on food quality and safety, reinforcing BLENDHUB's commitment to a food safety culture, continuous improvement, traceability, authenticity, and compliance with applicable legal and regulatory requirements. • Creation of Section 10.9 on Occupational Health and Safety, reinforcing BLENDHUB's commitment to occupational risk prevention, physical and psychosocial health, the investigation of accidents and incidents, the right to disconnect digitally, and compliance with applicable legislation and international occupational health and safety management standards. • Update of Section 11 on gifts, invitations and business courtesies, incorporating a prohibition on accepting any benefit which, irrespective of its financial value, could give rise to a conflict of interest or compromise professional independence. • Review of Section 13.2 on	

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		access to the Ethics Channel, removing references to platforms, applications and links that had become obsolete. • Update of Section 13.3 on the Code review mechanism, including the Human Resources and Legal departments among the functions responsible for coordinating and preparing proposals for updates to the document.	

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1. Introduction

1.1 Our History.

BLENDHUB is a benchmark for innovation and technology in the agri-food sector.

Its origins lie in the **Premium Ingredients**, founded in 1997 by Henrik Stamm Kristensen, a Dane with extensive experience in the agri-food sector who decided to settle in Spain. Today, the company combines the transparency and trust associated with Denmark with the dynamic and agile character of Latin culture.

Its commitment and determination to offer food producers a comprehensive service, extending beyond the formulation and blending of powdered raw materials, has evolved into a technology and food-as-a-service platform. It supports individuals and companies from the ideation stage through to the faster launch of new food products, enabling them to enter new markets and compete through agile innovation without the need for investment in infrastructure, through a global network of hubs.

BLENDHUB leads this approach, which challenges the status quo of the agri-food value chain and enables access to new markets quickly and at lower cost, while offering a comprehensive service covering the design, optimisation and supply of powdered food blends.

To achieve this, BLENDHUB positions itself as an enabler for companies within the sector, allowing them to internationalise by producing locally and generating new business opportunities.

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1.2 Words from the Founder.

Dear Team and Partners:

At BLENDHUB, we act ethically and responsibly not only because it is the right thing to do, but because we simply do not know any other way.

From the outset, BLENDHUB has championed a business model with a clear focus on sustainability, a commitment that is deeply embedded in everything we do.

We operate in the food sector, meeting one of the most basic human needs. We therefore cannot ignore the fact that millions of people around the world lack access to essential nutrition, suffer from hunger or are malnourished.

Our company has evolved into a multi-location service platform focused on technology and digitalisation to create a positive impact on society through our stakeholders. We aspire to change the rules of the game towards more efficient and sustainable global production, capable of producing at lower cost, with less environmental impact, and making food accessible to more people in more places.

The United Nations Sustainable Development Goals, particularly Goal 2 (Zero Hunger), Goal 12 (Responsible Consumption and Production) and Goal 17 (Partnerships for the Goals), define and inspire our business model. However, we want to go further in our social and sustainability commitments. We are therefore strengthening our management approach through an ESG strategy, with new and ambitious objectives in the areas of Environment, Social and Governance.

Environmental protection lies at the very heart of our business. Locating production closer to raw materials and end consumers reduces the distances that raw materials and finished products need to travel, resulting in lower transport-related emissions and a reduced carbon footprint.

Localisation also forms the basis of a replicable and efficient production model. At BLENDHUB, we were pioneers in developing a flexible and resilient business model through our platform, creating more sustainable supply chains based on a replicable circular model that can be implemented anywhere in the world.

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Furthermore, the core of our activity, the transformation of food into powder, is one of the pillars of this circular model. Through this activity, we help reduce food waste, extend product shelf life and, ultimately, improve people's access to essential nutrition.

In this regard, we have launched various charitable initiatives over the years. In 2007, we developed two highly nutritious products for distribution in schools managed by FUNDASE in El Alto, Bolivia. Subsequently, in 2018, together with the NGO Feed A Billion, we helped provide food to more than 400 girls in the Yuwa region of India. More recently, again in partnership with this NGO, we launched the NouriShe project to tackle food insecurity and provide essential nutrients to girls in disadvantaged communities and countries.

Above all, we care about people, their development and their wellbeing. We believe that the people who make up our company are our most valuable asset. Our teams are diverse, committed and supportive, and are expected to act with integrity, responsibility and respect.

The health and safety of our employees and collaborators are among BLENDHUB's highest priorities. To support this commitment, we have stringent health, safety and risk-prevention protocols in place across all our hubs. We also encourage the exchange of information and cooperation between employees, customers and suppliers in order to continuously improve our supplies, products and services, with quality, food safety, people's safety and occupational health remaining priorities at all times. Any organisation or individual wishing to collaborate with BLENDHUB must share these principles and commit to complying with our safety protocols and the high quality standards that characterise our activities.

Ultimately, BLENDHUB is an ambitious, committed, rigorous, honest and forward-thinking company that promotes the utmost respect for human rights, equal opportunities and internal equity.

These values, which shape our identity, must be consistently reflected in the behaviour of everyone who is part of BLENDHUB, both within the company and in our relationships with customers, partners and other stakeholders. BLENDHUB's credibility and reputation depend on the commitment of all

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employees and collaborators to our values and to the Code of Conduct presented here.

Only in this way can we contribute to creating value both within the company, by fostering a collaborative, respectful and dynamic working environment, and beyond it, by engaging with our stakeholders in an ethical, responsible and transparent manner. This will enable us to strengthen long-term relationships with our existing customers and partners, attract new ones and remain focused on achieving our business objectives in a sustainable manner (ESG).

After years of successes and mistakes, active listening and self-reflection, we have arrived at where we are today with a clear understanding of what we want to achieve and how we intend to achieve it, with responsibility and honesty.

Kind regards,

Henrik S. Kristensen

Founder

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1.3 Our Mision, Vision, Purpose and Values.

Our Mision

BLENDHUB provides access to a global platform of services, technology and expertise to optimise the production and supply of powdered food blends.

Our Vision

We aim to lead a transformation in the agri-food value chain, making access to staple foods fairer and safer, and enabling food to reach more people in more places.

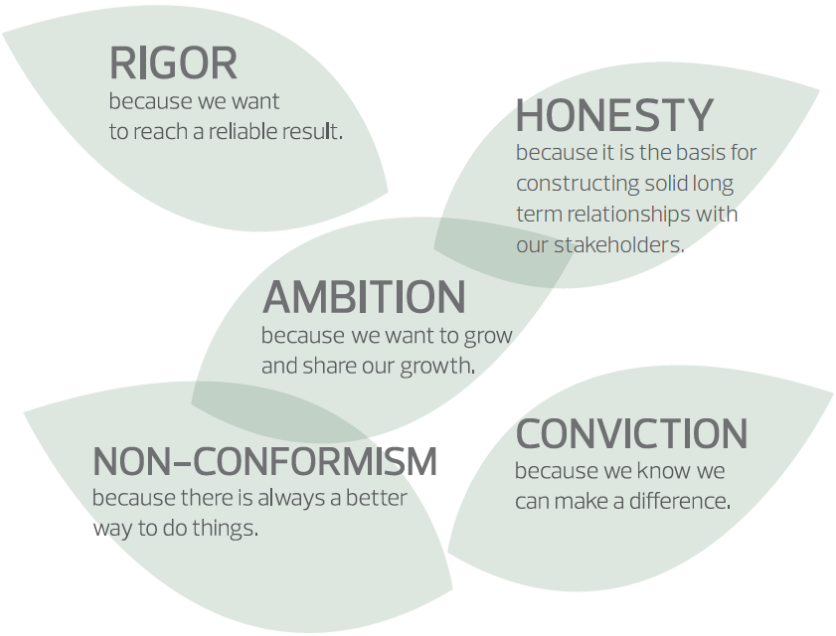
Our Purpose

To feed the world, leaving hunger behind.

Our Values

We take a very practical approach to our values: they are the tools that enable us to manage our business and achieve our vision. They must be reflected in everything we do and guide our relationships with all our stakeholders.

Our values are:

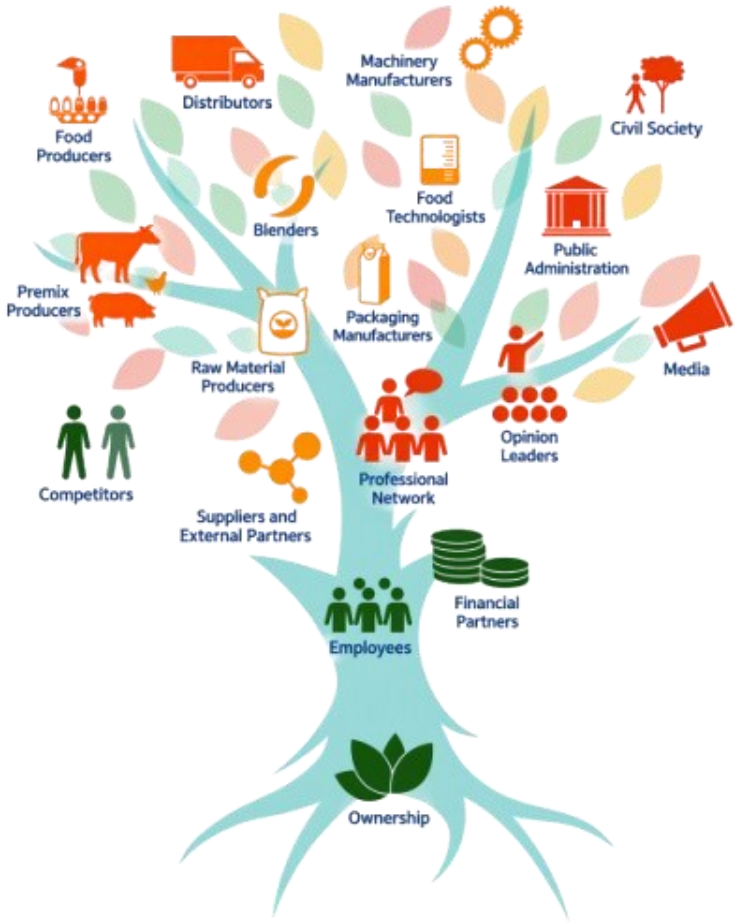


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1.4 Our stakeholders.

In this Code, you will find guidelines to help you understand how we approach our relationships with all our stakeholders. As employees, we are the primary users and beneficiaries of this Code, as we have a responsibility to represent the company in our dealings with customers, suppliers and any other stakeholders.

It is essential that everyone who works at BLENDHUB conveys a consistent way of behaving and that our conduct faithfully reflects our identity. The way we behave, aligned with the values that shape our identity, defines our culture, and it is this culture that sets us apart.



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2. Objective and aim

This Code of Ethics and Conduct aims to establish the values that should guide behaviour at BLENDHUB, setting out standards of conduct that must be shared, accepted and respected by all employees. The purpose of the Code is to help us understand how to translate BLENDHUB's values into genuine, tangible behaviours, thereby strengthening our identity and image.

This Code is intended to guide relationships between BLENDHUB employees, as well as their relationships with the company's other stakeholders, translating BLENDHUB's Mission, Vision, Purpose and Values into expected behaviours.

The Code of Ethics and Conduct is a fundamental element of our internal control policy, ensuring that appropriate mechanisms are in place to support employees in fulfilling their obligations, protecting their rights and carrying out activities on behalf of BLENDHUB. It sets out the ethical values, commitments and good practices that must be applied in the management of our business. We must ensure that our activities are conducted, at all times, with the highest level of integrity.

We are all responsible for complying with these guidelines. The Code applies to all BLENDHUB employees, regardless of their role, location or level of seniority. In addition, all suppliers, partners and collaborating companies must also act in accordance with the standards and behaviours set out in the Code of Ethics and Conduct when carrying out activities on our behalf.

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3. Scope of Application

3.1 This Code of Ethics and Conduct applies to all professionals associated with any company within the Blendhub Group, regardless of their location or company name.

For these purposes, the following are considered "Professionals":

i) Members of the governing bodies.

ii) Members of management, the executive team and the workforce.

iii) Members of Blendhub's professional network.

iv) Students on work placements and interns.

All of them, regardless of the legal basis governing their employment or service relationship, their level of seniority, their geographical or functional location, or the Group company for which they provide their services.

BLENDHUB professionals who manage or lead teams shall also ensure that the Professionals directly under their supervision are aware of, understand and comply with this Code of Ethics and Conduct, and shall lead by example.

3.2 Se entiende por "BLENDHUB" o "Grupo Blendhub" a Blendhub S.L., todas las sociedades directa o indirectamente controladas por ésta, así como todos los Hubs y sus respectivas sociedades mercantiles, situados en cualquier país o región.

3.3 In companies and entities in which BLENDHUB does not hold a majority interest and/or exercise control, but for which it is responsible for management, those representing BLENDHUB shall promote the application of the Mission, Vision, Purpose, Values, Principles and standards of conduct established in this Code.

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4. Compliance Committee

The BLENDHUB Compliance Committee is the body responsible for overseeing the organisation's Compliance Management System and promoting a culture of ethics, integrity and compliance at all levels of the company.

The Committee is responsible for establishing and approving the principles, control mechanisms and instruments necessary to ensure the effective management of compliance, setting priorities for action and promoting the effective implementation of internal policies and procedures. Its members must act as role models in matters of ethics and compliance, actively promoting behaviours that are aligned with BLENDHUB's values and principles.

The Compliance Committee is also responsible for overseeing BLENDHUB's Crime Prevention and Detection Model, ensuring the identification, assessment, monitoring and mitigation of risks that may affect the organisation. To this end, it has the necessary authority to propose, develop, approve and promote any measures, controls and internal rules deemed appropriate.

Its responsibilities include monitoring, periodically reviewing, updating, promoting and communicating this Code of Ethics and Conduct, as well as overseeing its proper application throughout the organisation. Any proposals to amend or update the Code shall be submitted to the company's governing body for its information.

The Compliance Committee shall comprise permanent members appointed by the organisation. Other individuals may also be invited to participate where the nature of the matters under consideration requires specific knowledge or specialist technical expertise. Such individuals shall participate in an advisory capacity and on the terms determined by the Committee.

For any queries or communications relating to compliance, employees may contact the Compliance Committee via the following email address: compliance@blendhub.com.

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5. Basic Principles of Conduct

The Basic Principles of Conduct should determine the ethical standards and behaviours that apply to all activities and tasks we carry out in connection with BLENDHUB. Following these principles will enable us to act professionally and with integrity at all times and will support us in making appropriate decisions.

Of all the principles that should guide our behaviour and actions, the Principle of Sustainability must always be at the forefront and guide all other principles. This means ensuring the continuity of our purpose while remaining aligned with our ecosystem. It is about achieving a balance between economic, social and environmental considerations in everything we do.

5.1 Principle of Social Commitment

At BLENDHUB, we seek to promote the common good above individual interests and have a strong social commitment, reflected in our absolute respect for Human and Labour Rights.

BLENDHUB is committed to complying with all national and international legislation relating to Human and Labour Rights, as well as with the guidelines, principles and obligations established by the Universal Declaration of Human Rights (UDHR), the International Labour Organization (ILO) and the United Nations Global Compact (UN Global Compact).

BLENDHUB expresses its firm commitment to individual freedoms, democracy and freedom of expression, as well as its commitment to supporting the development of the communities in which it operates.

- We must promote, respect and protect Human Rights, ensuring that we do not contribute, either directly or indirectly, to any violation of those rights.

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- BLENDHUB shall put in place the necessary measures to ensure compliance with the provisions of the International Labour Organization (ILO), paying particular attention to those relating to child labour and discrimination. BLENDHUB shall not tolerate any practice, whether within the organisation or by any other company collaborating with BLENDHUB, that is contrary to these provisions or to any other principle established by the ILO.

- BLENDHUB declares its absolute rejection of all forms of forced or compulsory labour.

- BLENDHUB is committed to respecting freedom of association and the right to collective bargaining.

- BLENDHUB is committed to promoting equal opportunities in access to employment.

- BLENDHUB will only work with suppliers that do not undermine the working conditions of their employees.

- We must work together with our stakeholders to foster their commitment to social responsibility and help eradicate any form of violation of Human Rights.

- We must not tolerate child labour, regardless of the country in which BLENDHUB operates.

- We must not engage in or tolerate any form of discrimination against any person, irrespective of their activity or role within BLENDHUB, on grounds related to personal, physical or psychological circumstances, ideology or political views, religion, race, ethnicity, sex, gender, sexual

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orientation, marital status, social origin or nationality.

5.1.1 Principio de Seguridad y Salud en el Trabajo

One of BLENDHUB's main objectives is to achieve the highest standards of health and safety for its workers and any third parties who may be present at our facilities, as well as for those carrying out activities on behalf of the organisation, whether on or off our premises. Providing Professionals with the necessary resources to maintain a healthy and safe working environment is a key priority for BLENDHUB, helping to protect their health and prevent any physical or psychological harm.

- We will promote the adoption of the best and most advanced practices in occupational health and safety, as well as full compliance with current occupational health and safety legislation, always with the aim of continuous improvement.

- We will strictly observe all occupational health, safety and hygiene measures, avoiding any actions that could put people's health or physical integrity at risk.

- We must understand the hazards associated with our activities and establish appropriate control measures.

- We will make proper use of all required safety and protective measures.

- We will establish systems to anticipate, detect and respond to potential risks.

- We must remain informed and appropriately trained on the risks inherent in our work, as well as on the means and measures to be adopted to prevent them.

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- If we identify any risk affecting our own safety or that of others, we must report it immediately to BLENDHUB.

- Working under the influence of alcohol, drugs or any legally prescribed or over-the-counter medication that may impair our cognitive abilities is strictly prohibited.

- At BLENDHUB, we recognise the importance of maintaining an appropriate work-life balance and will therefore promote measures to support this.

- We will promote the adoption of effective and meaningful health and safety practices among our suppliers, customers and any other companies with which we collaborate.

5.2 Principle of Good Governance

This principle is, in turn, divided into the Principle of Legal Compliance, the Principle of Integrity and Professionalism, and the Principle of Food Quality and Safety:

5.2.1 Principle of Legal Compliance

- In all our professional relationships, we must act honestly and fairly and always comply with applicable laws and regulations.

- BLENDHUB Professionals undertake to act in accordance with the laws and regulations in force in the jurisdictions in which they carry out their activities.

- All commitments and obligations assumed by BLENDHUB in its contractual relationships with third parties shall be fully respected.

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- We will respect the customs, practices and recognised good practices of the countries in which BLENDHUB operates.

- Those with management and leadership responsibilities at BLENDHUB undertake to comply with the laws and other legal requirements applicable to their areas of activity.

- Those with management and leadership responsibilities at BLENDHUB must ensure that the Professionals reporting to them receive the necessary information and training to enable them to comply with the legal obligations applicable to their roles and responsibilities.

- We will ensure that we only maintain relationships and conduct business with companies and individuals who act honestly and in compliance with applicable laws and regulations.

- We must ensure that valid and legally binding written contracts are in place and remain in force for all relationships with customers, suppliers and other third parties.

- We must ensure that all our suppliers respect and share our ethical standards and are familiar with the content of this Code of Ethics and Conduct.

- Under no circumstances will we enter into or continue business relationships with third parties once we become aware that they are deliberately or recklessly involved in unlawful activities..

5.2.2 Principle of Integrity and Professionalism

- We must act honestly, loyally, objectively, responsibly, diligently and

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efficiently, in good faith and always in accordance with BLENDHUB's interests.

- BLENDHUB Professionals must conduct themselves with integrity in all their professional activities, avoiding any conduct that could damage BLENDHUB's reputation or adversely affect the interests or image of the Company and its members, even where such conduct does not breach any applicable rules or regulations.

- We must act professionally, responsibly, diligently and efficiently, always carrying out our activities to the highest possible standards of quality and excellence and striving for continuous improvement.

5.2.3 Principle of Food Quality and Safety

- We must monitor and control, within the scope of our activities and responsibilities, that BLENDHUB's products meet the required quality standards. In addition, we must report any deviation from the required level of quality as soon as we become aware of it.

- We must ensure the quality and safety of our products and services. This means ensuring that all BLENDHUB food products are produced, processed, distributed and marketed in a manner that safeguards their quality and food safety.

- We must strive to ensure that our customers are satisfied with our products and services and that their food-related requirements are met.

- All members of the organisation will be involved in the development and continuous improvement of BLENDHUB's Management System.

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- We will provide the organisation with appropriate mechanisms to establish and achieve its Food Quality and Safety objectives.

- We must ensure compliance with all legal and regulatory requirements applicable to our activities.

- BLENDHUB will foster a Food Safety Culture by raising awareness and improving the behaviour of its employees.

- We must provide our customers and suppliers with both extrinsic and intrinsic traceability and assurance, from the point at which raw materials enter our facilities through to the dispatch of finished products.

- BLENDHUB Management's commitment to Food Quality and Safety extends to everyone within the organisation, each according to the level of responsibility applicable to their duties and to the function or position they perform within BLENDHUB.

5.3 Principle of Environmental Commitment

At BLENDHUB, we are genuinely committed to protecting the environment, and we apply this commitment across all our activities.

- We must balance the requirements of our business activities with the utmost respect for the environment, always seeking to minimise any negative environmental impact.

- We must comply with applicable environmental legislation and regulations, as well as with any other requirements to which BLENDHUB subscribes.

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- BLENDHUB will raise awareness among and engage all its employees in the need to respect the environment when carrying out their activities.

- We must use natural resources, raw materials and energy responsibly and efficiently in order to achieve the highest possible level of eco-efficiency.

- We are committed to identifying new technologies that can improve the efficiency of BLENDHUB's interaction with the environment.

- BLENDHUB Management's commitment to continuous improvement and environmental protection extends to everyone within the organisation, each according to the level of responsibility applicable to their duties and to the function or position they perform within BLENDHUB.

- We will raise awareness among and engage our suppliers in complying with applicable environmental legislation and regulations.

6. Conduct of the Owners

BLENDHUB's ownership drives, inspires and leads the way in which BLENDHUB conducts itself, while also undertaking to lead by example through the following commitments:

- We are prepared to fulfil our duties and honour our commitments.

- We will not say yes to everything. We will be self-critical and seek continuous improvement.

- We are prepared to listen to all opinions.

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- We will strive for transparency and honesty in all our communications. We will not shy away from reality.
- We will acknowledge our mistakes.
- We will maintain our leadership and see things through to the end.
- We will remain fully aware of the impact that our example has on others.

7. Conduct towards Customers

Our relationships with our customers are a fundamental part of our work, and their needs are our priority. We must therefore conduct ourselves appropriately in all our interactions with them and remain committed to delivering the highest standards of quality and excellence in our products. We must strive not only to meet our customers' expectations, but to exceed them.

- We will always manufacture our products ethically and responsibly.
- We must safeguard the safety of our customers.
- We must respond to our customers' needs with responsibility, respect and professionalism.
- All relationships with our customers must be based on commitment, trust, effort and integrity.
- Professionals must not receive any form of remuneration from BLENDHUB customers or, more generally, accept any external

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remuneration for services arising from their professional activities within BLENDHUB.

- In our relationships with customers, we must apply and respect the principles of transparency, information and protection, as well as all rights afforded to customers under applicable legislation.

- We must protect the information and data entrusted to us by our customers.

- We will respect diversity and equality in all their forms, treating everyone with respect and providing services that address customers' needs and prevent discrimination.

- We will communicate and market our products and services honestly and ethically, avoiding misleading messages or advertising.

- We will avoid competing with our collaborators or customers.

- We will maintain strict control over the production process at all locations.

- We will ensure traceability.

- We will ensure open, transparent and effective communication before, during and after the business relationship.

- Where applicable, we will manage the termination of a business relationship honestly.

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- We will fulfil our commercial commitments in terms of timing, form and content.

- All communications, including advertising, campaigns, promotions and sponsorships, will be governed by principles of ethics and truthfulness.

- We will provide our customers with accessible channels through which they can submit claims, reports, complaints, suggestions or requests for information.

8. Conduct towards Suppliers

Our relationships with our suppliers must, in all cases, be based on mutual trust, founded on professional and ethical conduct, both internally and externally.

- BLENDHUB Professionals must not receive any form of remuneration from BLENDHUB suppliers or, more generally, accept any form of external remuneration for services arising from their professional activities within BLENDHUB.

- Supplier selection processes will be conducted impartially, objectively, transparently and fairly. Quality and cost criteria must be applied in these processes, while always avoiding any conflicts of interest or favouritism.

- We will base supplier selection criteria solely on quality, price and service.

- We will always consider several offers and alternatives to ensure the integrity of our decisions.

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- We will not disclose prices to third parties without the supplier's approval.

- Prices and information submitted by suppliers as part of a selection process will be treated as confidential and will not be disclosed to third parties, except with the consent of the parties concerned, where required by law, or in compliance with judicial or administrative decisions.

- Information provided to BLENDHUB suppliers will be truthful and will never be intended to mislead.

- We will not accept from our suppliers any financial benefit, gift or invitation whose value exceeds what may reasonably be regarded as symbolic or a customary courtesy.

- We must work with our suppliers to promote the adoption of the principles and standards of conduct set out in this Code of Ethics and Conduct.

- We will fulfil our commercial commitments in a timely manner and in accordance with the agreed terms and conditions.

- We will seek suppliers whose values are aligned with our own, who respect fundamental rights at work and safeguard the dignity of their workers, with particular emphasis on the prohibition of child labour, exploitation and forced labour.

- We will provide our suppliers with accessible channels through which they can submit claims, reports, complaints, suggestions or requests for information.

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- All BLENDHUB suppliers, irrespective of the product supplied or service provided, must accept this Code of Ethics and Conduct and undertake to comply with its principles and standards of conduct as a fundamental basis of our business relationship. In this regard, they may be subject to any checks or assessments that BLENDHUB considers appropriate at any given time..

9. Conduct between People within the Organisation

The people who make up BLENDHUB bring a diverse range of skills, knowledge, experience, cultures and perspectives. At BLENDHUB, we work to create an inclusive working environment that enables everyone to achieve their full professional and personal potential. We not only respect these individual differences, but actively embrace and encourage them in pursuit of a common goal.

9.1 Respect among Members of the Organisation

- We will not tolerate any form of discrimination on the grounds of colour, race, sexual orientation, marital status, family responsibilities, age, religion, gender, disability, hierarchical position or any other grounds.

- We must work together to ensure that our workplace is respectful, fair, safe and free from any form of discrimination or harassment.

- All relationships between people within the BLENDHUB organisation must be based on respect for human dignity, trust, mutual respect and professionalism. Likewise, relationships between BLENDHUB employees and employees of partner companies must be based on these same

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principles, as well as on professional respect, mutual trust and collaboration.

- We will treat those we work with respectfully, avoiding any form of abuse of power in our relationships, conduct or language.

- We will avoid preferential treatment based on any personal preference or interest.

- Abuse of authority and any form of harassment, whether physical, psychological or moral, including workplace bullying, are expressly prohibited, as is any other conduct that could create an intimidating, offensive, insulting or hostile working environment.

- If we have any doubts regarding the messages or communications we use in our day-to-day relationships on behalf of BLENDHUB, we will refer to the relevant corporate guidelines and/or seek guidance from our managers.

9.2 Culture of Continuous Improvement

- We must learn from our mistakes and improve day by day.

- We will foster an environment of openness in which the views of others are taken into consideration, even when they differ from our own, so that we can improve and move forward together.

- We will learn from the ways in which others act, work and make decisions.

- We must not set limits on our professional development.

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- We will take reasonable risks in the best interests of BLENDHUB.

- We must carry out our activities with the future in mind, as well as the personal and professional growth of the people who are part of our teams, BLENDHUB and ourselves.

- We must not limit the professional or personal growth of our colleagues.

9.3 Responsibilities of Individuals with Management and Leadership Responsibilities

At BLENDHUB, we believe that those with management and leadership responsibilities should serve as role models for the organisation's principles and values. We consider those in leadership positions to set the standard for the conduct and leadership we seek to promote among all employees.

Everyone at BLENDHUB must act responsibly and honestly. However, the level of responsibility is proportionate to the duties and authority associated with each person's role within the organisation. Therefore, those with management and leadership responsibilities must be particularly mindful of the impact that their behaviour and decisions may have on the people within their teams, acting at all times in an exemplary manner and in line with the Company's values.

- The pursuit of excellence is part of our corporate DNA. Our objective is to achieve both professional and personal success, and those of us in management and leadership roles will devote our best efforts to achieving this and meeting the expectations of the company's owners, employees, collaborators, suppliers and customers.

- We must help to find ethical solutions to the dilemmas raised by our collaborators.

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- We must promote a culture and working environment based on integrity and regulatory compliance.

- We must base our professional relationships on respect, fairness, support and mutual trust.

- BLENDHUB's leaders are responsible for encouraging and motivating their teams and are ultimately accountable for ensuring that their collaborators comply with our internal standards of conduct.

- We must not criticise BLENDHUB without justification.

- We will ensure that all our collaborators have completed the mandatory training on this Code and have understood and internalised its content.

- We must provide support with any questions or concerns that members of our teams may raise in relation to this Code, ensuring that such matters are addressed without unnecessary delay. Where leaders do not have a clear answer or guidance, they must seek support and advice from Human Resources, Legal or the Compliance Committee. Under no circumstances may they give instructions that are contrary to applicable legislation, the provisions of this Code or any other internal rules of the organisation.

- Those who hold leadership responsibilities must set an example for their teams. The way in which they act and manage conflicts, disagreements or complex situations must at all times reflect BLENDHUB's values and principles. This responsibility requires them to act with integrity, consistency and exemplary conduct, in keeping with the position they hold within the organisation.

9.4 Recruitment, Hiring and Promotion

The recruitment, hiring and promotion of Professionals will be based on merit, skills, capabilities and the effective performance of their duties, while maintaining an open approach to diversity and with the aim of identifying those individuals whose profiles are best suited to the requirements and needs of the position to be filled.

- In our recruitment, internal promotion, training and remuneration processes, we will apply criteria based on competence, suitability and professional merit, as well as the effective demonstration of our values.

- Any recruitment or promotion process, whether internal or external, will take into account the professional qualifications and capabilities of the candidates for the position.

- Applicable local or national policies aimed at promoting diversity and inclusion in the workplace will be observed.

- Decisions will always be based on objective criteria.

- We will not employ public officials or public-sector employees who, during the previous two years, have had significant involvement in matters that could give rise to a conflict of interest with BLENDHUB. The Compliance Committee must be notified of any cases in which immediate family members of the public officials or public-sector employees referred to above participate in recruitment, hiring or promotion processes.

- Being an immediate family member (a spouse or person in an equivalent relationship, parents and other direct ascendants, children and other direct descendants, brothers and sisters, as well as uncles, aunts, nephews, nieces and relatives by marriage of an equivalent degree) will

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not exempt an individual from meeting the requirements applicable to all other candidates.

- The Compliance Committee must be notified in advance of any cases in which immediate family members of the person or persons responsible for the selection process are to participate in recruitment processes or processes to fill vacancies..

10. Conduct of Employees towards BLENDHUB

At BLENDHUB, we ensure compliance with all legal obligations and uphold integrity and diligence in everything we do, avoiding any conduct that could harm BLENDHUB's assets, reputation or image.

Pursuing and achieving our professional objectives is a fundamental part of our work, but we must always ensure compliance with internal rules and policies.

10.1 Transparency and Record-Keeping

- All information must be recorded accurately and objectively, at all times in accordance with the relevant responsibilities and legal requirements.

- All BLENDHUB transactions must be clearly and accurately reflected in BLENDHUB's records, with particular attention paid to ensuring that accounts are properly recorded, together with all transactions carried out and expenses incurred.

- We will refrain from any practice that is inconsistent with our commitment to recording transactions clearly and accurately in BLENDHUB's records.

- We will take particular care to ensure the reliability of the information entered into BLENDHUB's IT systems.

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- All transactions, movements of goods or funds, recruitment matters and employment records must be recorded in accordance with the legal provisions applicable to each area of BLENDHUB's activities, with particular regard to the principle of presenting a true and fair view and always exercising the utmost diligence.

- We must ensure that all financial reports and analyses for which we are responsible are communicated honestly and accurately.

- All cash transactions must be properly recorded and documented.

- We must not amend records without proper authorisation. Under no circumstances is the falsification of records permitted, whether authorised or otherwise.

- We must seek to identify any potentially inaccurate representation of accounts, data or records, as well as any potential instance of fraud or deception, and raise any concerns regarding the accuracy of financial reports.

- We must not provide information, whether verbally or in writing, concerning our operations that could enable a customer or supplier to make inaccurate or misleading statements.

- We will cooperate with both internal and external auditors, as well as with the competent authorities requiring information.

- We must provide the competent authorities and bodies, as soon as possible, with any information in our possession that is required in connection with transactions carried out. The falsification or concealment of information is strictly prohibited under all circumstances.

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10.2 Use of Assets and Resources

BLENDHUB provides its employees with the assets and resources necessary to carry out their professional activities. These resources are made available to us solely for professional and business purposes.

- We must ensure that assets and resources are used appropriately and for their intended purposes.
- We will take proper care of BLENDHUB's resources and assets.
- The misappropriation or improper use of resources and assets is strictly prohibited.
- We must protect and safeguard BLENDHUB's resources against damage, deterioration, loss, theft or misuse.
- We will immediately report the loss or theft of any BLENDHUB resource or asset.
- We must pay particular attention to policies, procedures, guidelines and any other internal rules or instructions relating to information security and data protection.
- We must make appropriate use of IT systems, avoiding, among other things, the installation of unauthorised software, accessing protected information without the necessary authorisation, engaging in any activity that may interfere with the performance of equipment or networks, or carrying out any illegal or unethical activity or any activity that could have an adverse impact on BLENDHUB.

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- We must not install or connect external devices or equipment to BLENDHUB's IT systems without prior authorisation.

- Under no circumstances may we disable the security measures implemented on BLENDHUB's IT systems.

- We must not share our personal login credentials or passwords with other people.

- BLENDHUB may establish controls over the use of corporate email, internet access and IT equipment in order to protect the integrity of BLENDHUB and its employees, while always respecting employees' privacy and dignity.

- Corporate email must not be used to send pornographic material, propaganda, discriminatory content, chain letters or any other information or material that is contrary to accepted standards of conduct or to this Code.

- Any personal use of BLENDHUB's IT systems must be reasonable. There should be no expectation of privacy when using corporate IT systems.

- We must not use BLENDHUB's payment methods, including corporate credit cards, for personal purposes.

- BLENDHUB's resources and assets are the property of BLENDHUB and, therefore, we must not appropriate, give away or otherwise dispose of any BLENDHUB materials, resources or assets without authorisation.

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10.3 Corporate Image and Reputation

For BLENDHUB, both the image we project externally and the way in which we are perceived are fundamental. We make every effort to do things properly and conduct all our activities in accordance with a set of essential ethical principles and commitments. We therefore want the outside world to understand who we are and what we stand for.

Together, we contribute every day to making BLENDHUB what it is. For this reason, our corporate image, reputation and the trust placed in us by society are among our most valuable assets.

- We must take the utmost care in all our professional activities to preserve BLENDHUB's image and reputation.
- We will pay particular attention to protecting BLENDHUB's image and reputation when making public appearances or statements.
- We aim to be, and must strive to remain, a trusted benchmark within our industry and in the countries in which we operate.
- We will ensure that BLENDHUB's image and reputation are respected by customers, suppliers and any other companies with which we collaborate.
- We will exercise our rights and fulfil our responsibilities as citizens responsibly in the communities in which we operate.
- We will not make statements that could unjustifiably damage the reputation of BLENDHUB or of the people who form part of the organisation, particularly in public or professional settings. Any observations, disagreements or criticism must be expressed respectfully

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and with a focus on continuous improvement and finding solutions.

- We will encourage open communication and constructive criticism based on objective and verifiable facts, avoiding the spread of rumours, speculation or unsubstantiated comments that could create an atmosphere of mistrust or adversely affect individuals or the organisation.

- Whenever a BLENDHUB Professional participates in a public event on behalf of and/or representing BLENDHUB, they must inform BLENDHUB in advance.

10.4 Confidentiality, Data Protection and Intellectual and Industrial Property

Information and data, particularly personal data, collected, stored, retained, managed or otherwise obtained in relation to employees, customers, suppliers or any other natural or legal person must be handled appropriately, ensuring their confidentiality, privacy, integrity and security at all times.

BLENDHUB's intangible assets must also be protected, including confidential information, know-how, trade secrets, intellectual and industrial property, and any content, documents or developments created in the course of professional activities. Any unauthorised disclosure, use or reproduction of such assets must be prevented.

Artificial intelligence tools must be used in accordance with the organisation's internal policies, ensuring at all times the protection of confidential information, personal data, and the intellectual and industrial property rights of BLENDHUB and third parties..

- All BLENDHUB employees must exercise the utmost care when handling information and personal data to which they have access in the course of their professional activities. They must also adopt the necessary technical and organisational measures to ensure its protection and act

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in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (GDPR), Organic Law 3/2018 of 5 December on the Protection of Personal Data and Guarantee of Digital Rights (LOPDGDD), as well as any other national or international legislation applicable to BLENDHUB in relation to data protection, privacy, information security and the responsible use of artificial intelligence systems.

- Artificial intelligence tools must be used in accordance with BLENDHUB's internal policies. Confidential information, trade secrets or personal data must not be entered into unauthorised systems.

- Any creation, development, document, procedure, methodology, design, presentation, report, software, database, digital content, invention, technical improvement or other work product created by employees in the performance of their duties or using BLENDHUB resources shall belong to BLENDHUB in accordance with applicable legislation and the agreements entered into with the organisation.

- Employees must respect the intellectual and industrial property rights of third parties and may only use protected content, software, images, trade marks, documentation and other protected assets where the appropriate authorisation or licence has been obtained.

- Likewise, artificial intelligence tools must be used in accordance with BLENDHUB's internal policies, ensuring the protection of confidential information, personal data and the intellectual and industrial property rights of both the organisation and third parties.

- Both BLENDHUB and its employees undertake to maintain the confidentiality of all information obtained by virtue of their activities or positions and must not use such information for their own benefit or that

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of third parties, or to the detriment of the public interest.

- Only information and data that are necessary for the effective performance of BLENDHUB's activities will be requested and used.

- We must apply all appropriate security measures when storing, classifying and processing information, whether in electronic or physical form.

- Furthermore, any stakeholder may exercise their rights of access, rectification, erasure, objection, restriction of processing or data portability. Anyone with questions about how we process their personal data, or about any other related matter, may contact us in writing at Calle Cardenal Belluga, par. 24-23, Pol. Ind. Oeste, 30169 San Ginés, Murcia (Spain), quoting "Personal Data", or by email at privacidad@blendhub.com.

10.5 Management of Conflicts of Interest

A "conflict of interest" arises when an individual's private interests interfere, either directly or indirectly, with the interests of BLENDHUB. By way of example, the following situations may give rise to a conflict of interest:

- Being involved, personally or through a family member, in any transaction or financial operation to which BLENDHUB is a party.
- Negotiating or entering into contracts on behalf of BLENDHUB with individuals or legal entities connected to the Professional, or to persons associated with them, where the Professional holds a management position or acts as a shareholder or director.
- Being a significant shareholder, director, board member or similar of any customer, supplier, or direct or indirect competitor of BLENDHUB.

Ultimately, all professional decisions must be based on protecting the best interests of BLENDHUB and must not be influenced by personal or family

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relationships or by any other private interests of BLENDHUB Professionals.

- We will only employ or establish professional relationships with family members where the decision is based on objective and professional criteria.

- Under no circumstances will we establish relationships with customers or suppliers where professional independence or objectivity may be compromised.

- We will not establish relationships or engage in conduct that could constitute an abuse of power to the detriment or benefit of third parties.

- We will not use our position at BLENDHUB for personal gain or for the benefit of related persons.

- Where a personal relationship exists between employees that could give rise to a conflict of interest or a direct hierarchical reporting relationship, it must be disclosed. Therefore, where a personal relationship exists, has existed or arises between employees, they must report it by email to compliance@blendhub.com. The Company will treat this information as strictly confidential.

- Any concerns or questions regarding conflicts of interest must be brought to the attention of the Compliance Committee, which will be responsible for assessing the matter.

10.6 Market Conduct

At BLENDHUB, we are firmly committed to free and fair competition, as well as to compliance with all applicable national and regional regulations.

- We will avoid engaging in any conduct that could constitute an abuse or

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unlawful restriction of free competition.

- We will collect and use only competitively relevant information obtained through lawful means.
- We must protect our competitively sensitive information from disclosure to competitors.
- Under no circumstances will we directly or indirectly fix, or attempt to agree with competitors, prices or any other commercial terms.
- We will not recruit employees of competing companies for the purpose of obtaining confidential or commercially sensitive information.
- We will only obtain information legitimately and through appropriate and lawful means.
- We will not copy or use patented or registered products without the owners' authorisation. Nor will we copy or plagiarise inventions or designs belonging to third parties.
- We will not engage in misleading advertising in relation to our activities or services.

10.7 Gifts and Invitations

We understand an "Item of Value" to mean anything of tangible or intangible value, broadly defined and in any form, including but not limited to: cash, cash equivalents (such as gift cards and product discounts), loans, gifts, invitations, goods, services, employment opportunities for family members, travel, accommodation, entertainment, meals, reimbursement of expenses, favours,

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business or employment opportunities, fulfilling a request to provide something of value to a third party, charitable contributions or contributions to other non-profit organisations, and promotional sponsorships.

- Under no circumstances may we offer, promise, pay, give or authorise the provision of any Item of Value, either directly or indirectly (through a third party), to:
  - Any public official or public-sector employee.
  - Any natural or legal person (whether public or private) for the purpose of improperly influencing a decision by a public official or public-sector employee in order to obtain or retain business or secure any other advantage. This prohibition applies regardless of whether the payment is intended to facilitate, expedite or speed up administrative procedures.

- We will not offer, promise, pay, give, authorise the provision to third parties of, or accept, any Item of Value of such significance that it could improperly influence the conduct of the recipient.

- No BLENDHUB employee may, in connection with personal purchases from business partners or suppliers, benefit from discounts, advantages or preferential terms that go beyond those generally available to all BLENDHUB employees.

- Under no circumstances will we offer, promise, pay, give or authorise the provision of any Item of Value to third parties where we know that there is a high likelihood that those third parties will, in turn, offer, promise or provide any benefit prohibited under this section.

- We must not use our own funds or those of third parties to circumvent the requirements set out above.

- Any gift received as a result of our activities at BLENDHUB with a value

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exceeding €100 must be reported in writing as soon as it is received to our line manager and notified through BLENDHUB's Ethics Line. The same requirement applies to any gift of a lower value where, due to the circumstances, it could give rise to a conflict of interest or compromise professional independence.

10.8 Food Quality and Safety

Food quality and safety are fundamental principles of BLENDHUB's activities and form part of our commitment to customers, consumers, authorities and other stakeholders. Everyone within the organisation is responsible for contributing to the highest standards of food quality and safety, acting with diligence, integrity and responsibility in the performance of their duties.

BLENDHUB promotes a strong Food Safety Culture based on prevention, continuous improvement, transparency and regulatory compliance, with the aim of ensuring the quality, legality, authenticity, traceability and safety of the products and services it provides.

- We are committed to complying with applicable national and international food safety legislation, as well as with BLENDHUB's internal standards, procedures and protocols established to ensure product safety, traceability, quality, legality and authenticity.

- We will actively contribute to strengthening the organisation's Food Safety Culture, acting with diligence, responsibility and transparency in the performance of our duties and immediately reporting any incident, deviation or risk that could compromise the quality, safety, legality or authenticity of our products.

- Failure to comply with these obligations may result in appropriate disciplinary action in accordance with applicable employment legislation and BLENDHUB's internal policies..

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10.9 Occupational Health and Safety

The health and safety of employees are a priority for BLENDHUB. The organisation promotes a safe, healthy and respectful working environment based on the prevention of occupational risks, continuous improvement, consultation with and participation of employees, and compliance with applicable legislation and internal health and safety standards.

BLENDHUB will conduct its activities in accordance with the principles of prevention, health protection and workplace wellbeing, promoting a preventive culture aligned with legal requirements and international best practices in occupational health and safety management.

- We will comply with all applicable occupational risk prevention and workplace health and safety legislation, as well as with the internal policies, procedures and instructions established by the organisation.

- We will use work equipment, personal protective equipment and safety devices provided to us correctly.

- We will take responsibility for our own health and safety, as well as that of any persons who may be affected by our actions or omissions in the workplace.

- We will immediately report any accident, incident, hazardous situation, unsafe condition or harm to health of which we become aware.

- We will actively cooperate in prevention activities, training, audits, accident investigations and the implementation of corrective and preventive measures.

- We will participate in the training and information activities organised by BLENDHUB in relation to occupational health, safety and workplace

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wellbeing.

- We will comply with the safety rules established at BLENDHUB facilities, as well as those applicable at the premises of customers, suppliers or third parties when acting on behalf of the organisation.

- We will promote a respectful working environment, free from violence, harassment, discrimination or any other behaviour that could adversely affect people's physical or psychosocial health.

- We will report any occupational accident, occupational illness, medical limitation related to our work or other circumstance that could affect our own safety or that of third parties, while respecting confidentiality and applicable data protection legislation at all times.

- We will respect the right to disconnect from work-related digital communications outside working hours, promoting the responsible use of technology and contributing to a healthy balance between professional, personal and family life, except in exceptional circumstances requiring immediate action for operational, safety or emergency reasons.

- We will refrain from carrying out activities while under the influence of alcohol, drugs or other substances that could impair our ability to perform our duties safely, except in the case of prescribed medication whose use is compatible with the work being performed and taken in accordance with the relevant medical advice.

11. Conduct towards Society

At BLENDHUB, we aim to contribute to improving society, public institutions and people's lives through our work and actions. We believe that we can contribute to the progress of the societies in which we operate and support

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their sustainable development.

11.1 Prevention of Money Laundering

It is essential to prevent and combat money laundering. Any funds derived from criminal or unlawful activities must be rejected and reported to the relevant authorities. Particular attention must therefore be paid to compliance with the anti-money laundering laws and regulations in force in each jurisdiction in which BLENDHUB operates.

- We must comply with the information and cooperation obligations imposed by the anti-money laundering legislation applicable in each territory in which we operate.

- We must pay particular attention to situations where there are indications that the individuals or entities with whom we do business may lack integrity.

- No payment shall be made or received unlawfully or inappropriately.

- In all circumstances, we must exercise particular care and pay close attention in the following situations:
  - Unusual cash payments due to their nature or amount.
  - Payments made by bearer cheque.
  - Payments made in currencies other than those previously agreed.
  - Payments made in a currency other than the legal tender of the country in which the transaction takes place.
  - Payments involving amounts significantly higher than usual.
  - Payments made to or by third parties not identified in the relevant contracts.
  - Payments made to accounts other than those normally used in dealings with a particular company, entity or individual.
  - Exceptional payments not provided for in the relevant contracts.
  - Payments made to companies, entities, individuals or accounts located

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in tax havens.

- Payments made to entities where the shareholder, owner or ultimate beneficial owner cannot be identified.
- Any transaction whose circumstances suggest that improper financial activities may be taking place.

We must carry out a timely and thorough due diligence and verification process in relation to any third parties with whom we conduct business.

Any suspicion of potentially unlawful activities involving a supplier or customer must be reported immediately through BLENDHUB's Ethics Line.

11.2 Counterfeiting of Means of Payment

Any activity involving the counterfeiting or fraudulent use of payment methods used by customers, suppliers or any other third party, including credit and debit cards, is strictly prohibited.

We must pay particular attention to any circumstances in which there may be indications of the counterfeiting, copying, alteration or unauthorised reproduction of credit or debit cards or travellers' cheques. It is essential to exercise caution to prevent BLENDHUB employees from becoming involved in any form of fraud, particularly given the opportunities provided by current technologies to carry out such unlawful activities.

We must respect and protect the integrity of data relating to payment methods. The storage or distribution of credit or debit card data, whether or not included in sales transaction receipts, is strictly prohibited. Only authorised persons may have custody of such data.

Any suspected use of counterfeit payment methods or suspicious activity

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relating to payment methods must be reported through BLENDHUB's Ethics Line.

11.3 Anti-Corruption and Anti-Bribery

At BLENDHUB, illegal or unethical practices aimed at obtaining benefits are not accepted. We believe that combating corruption is everyone's responsibility and, therefore, we take all possible measures to ensure that legal requirements and procedures are respected at all times.

- We must strictly comply with the anti-bribery and anti-corruption laws and regulations in force in all locations where we operate.

- Under no circumstances may we, either directly or indirectly, offer, give, request or accept any unjustified advantage or benefit intended, directly or indirectly, to obtain a present or future benefit for BLENDHUB, ourselves or any third party.

- We will not engage in illegal or unethical practices to influence individuals outside BLENDHUB for the purpose of obtaining any benefit for BLENDHUB or ourselves.

- We must not, directly or indirectly, make, offer or receive any payment in cash or in kind, or any other benefit which, due to its value, nature or circumstances, could reasonably influence the conduct of commercial, administrative or professional relationships.

- Non-contractual or unlawful payments to any person or entity, whether public or private, with the intention of obtaining or retaining business or securing any other benefit or advantage are expressly prohibited.

- We will refrain from making facilitation payments, regardless of their amount, in exchange for securing or expediting any procedure or action

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involving any court, official body or public authority anywhere in the world.

- We must not request or accept, directly or indirectly, gifts or incentives which, due to their value, could be considered anything other than a token gesture. Under no circumstances may gifts or benefits be requested or accepted where their purpose is to influence business dealings or where they could give rise to a conflict of interest.

- Any gift received as a result of our activities at BLENDHUB with a value exceeding €100, or any gift of a lower value which, due to the circumstances, could give rise to a conflict of interest or compromise professional independence, must be reported in writing to our line manager as soon as it is received and notified through BLENDHUB's Ethics Line.

- In all cases, any concerns or suspicions regarding practices related to corruption or money laundering must be reported through the Ethics Line..

11.4 Political Neutrality

At BLENDHUB, we respect the political and ideological pluralism of the people and communities in which we operate, while remaining politically neutral.

- All relationships with authorities, governments, public institutions or political parties will be based on strict compliance with the law and the principle of political neutrality.

- BLENDHUB respects freedom of expression, freedom of political thought and participation in public life, provided that such activities do not interfere with the proper performance of professional duties, are carried out outside working hours and take place outside BLENDHUB premises.

- Under no circumstances may participation in political or ideological activities

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as private citizens be carried out on behalf of or in representation of BLENDHUB.

- We will not associate BLENDHUB with any political position, ideology or viewpoint.

- We will not make financial donations to political parties.

12. Conduct towards Other Stakeholders

12.1 Media

- We will prepare our information materials accurately and clearly, without exaggeration or manipulation.

- We will respond promptly and honestly to requests for information.

- We will protect the Company's image and reputation, its strategy, and its tangible and intangible assets in the public domain.

- We will avoid expressing personal views or opinions that could be interpreted as representing BLENDHUB's corporate position.

- We will not make statements on matters outside our knowledge or area of responsibility and will refer any such enquiries to the appropriate persons within the Company.

- We will provide sufficient and accessible channels for engaging with the media.

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- We will not advertise or communicate features or specifications that our products and services cannot fulfil.

- We will strive to ensure the highest possible degree of neutrality and impartiality in the information we provide to the media.

- We all have a duty to understand and comply with our Social Media Policy and to use social media responsibly, in a manner that does not harm the Company's interests.

12.2 BLENDHUB Professional Network

- We will manage our relationships on the basis of mutual commitment.

- We will always remember that every member of our professional network is an ambassador for our brand, our project and our vision, and we recognise the importance of nurturing our relationships with them.

- We will work to ensure that our relationships are balanced and sustainable.

- We will strictly honour our commitments.

- We will take the time to listen to and understand their needs and expectations.

- We will prioritise working with those who share our ambitions and our business vision.

- Through our collaborations, we will seek and promote mutual growth, the creation of added value and relationships based on respect.

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- We will avoid being complicit in improper practices or business policies that are contrary to the Company's commitments, values and principles..

12.2 Financiers

- We will be as transparent as possible in the information we provide. We will establish effective risk control systems.

- We will provide projections based on real cases. We will strictly comply with agreed payment terms and conditions. We will seek to implement the most appropriate management and corporate governance systems.

- We will ensure the reliability and accuracy of our accounting and financial records.

- We will provide our investors with sufficient, accurate, timely and clear information, while ensuring they receive appropriate individual attention.

13. Application of the Code

13.1 Our Responsibility

As members of BLENDHUB, we are required to understand and apply the rules and guidelines set out in this Code in our day-to-day conduct, promote their application throughout the organisation and contribute to creating a culture of compliance. We must prevent and correct any conduct that breaches the Code and report to our line managers, the Compliance Committee (compliance@blendhub.com) or BLENDHUB's Ethics Line (whistleblowing channel) any conduct of which we become aware and which we believe to be contrary to the Code of Ethics and Conduct.

Both the Basic Principles of Conduct and the standards governing our relationships with customers, suppliers, team members, BLENDHUB, society and other stakeholders constitute standards of behaviour and ethical values that must be accepted, understood and respected by everyone to whom they apply.

BLENDHUB will establish appropriate mechanisms to ensure compliance with the guidelines set out in this Code, addressing any improper conduct and ensuring that all complaints or reports received are handled confidentially through the appropriate channels established for this purpose.

We will also provide training and make available to employees the tools necessary to promote awareness, understanding and practical application of this Code. The Code will also form part of the training provided to all new employees.

13.2 Ethics Line

BLENDHUB's Ethics Line is an essential component of its Compliance System and one of the mechanisms established to ensure the effective application of applicable legislation and the principles and standards set out in this Code.

This channel also provides a secure and confidential means of reporting potential breaches of which individuals become aware, whether observed directly or brought to their attention by team members, customers, suppliers or other stakeholders.

Reports made through this channel may relate, among other matters, to suspected unlawful conduct, regulatory breaches, violations of the principles established in this Code, or behaviour contrary to professional ethics and BLENDHUB's values.

The external entity responsible for managing the Ethics Line Platform and the Compliance Committee will handle reports received diligently and promptly, taking appropriate steps to verify the matters reported and promoting the measures required for their resolution, in accordance with the Ethics Line management procedures. Information will be assessed objectively, impartially

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and confidentially. The identity of the person making the report will be kept confidential. Information will only be disclosed to those areas whose involvement is necessary for the verification process, while ensuring that the investigation and the reputation of the individuals concerned are not adversely affected. Anonymous reports are permitted in all cases.

The outcome of the verification process will be communicated to the areas responsible for implementing the appropriate mitigation or corrective measures and, where applicable, to the person concerned by the report and the reporting person.

Individuals who report facts or conduct in good faith through the Ethics Line will not, under any circumstances, be subject to retaliation or suffer any other adverse consequences as a result of making such a report.

Any form of retaliation, threat of retaliation or attempted retaliation against reporting persons is strictly prohibited.

Any questions or enquiries concerning the operation or use of the Ethics Line may be addressed using the information available on BLENDHUB's corporate website or the information resources made available by the Company.

Interested persons may also request assistance or further information through the email address provided for this purpose:

- compliance@blendhub.com

This email address is intended exclusively for enquiries relating to the operation and use of the Ethics Line. Reports or notifications of potential breaches must be submitted through the official reporting channels established by BLENDHUB.

Up-to-date information on how to access the Ethics Line will be available on BLENDHUB's corporate website (https://www.blendhub.com/), under the "Ethics Line" section (https://blendhub.c-etico.es/). The Ethics Line can also be accessed directly through the BLENDHUB Ethics Line portal and through any internal communication channels designated by the organisation from time to time.

The Ethics Line does not prevent or restrict the reporting of matters directly to

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the competent authorities.

13.3 Review Mechanism

This Code will be reviewed at least every two years to ensure that it remains current, effective and appropriate to the needs of the organisation.

The Human Resources and Legal departments will be responsible for coordinating and preparing proposals to update this Code, taking into account regulatory developments, organisational needs and improvements identified through its practical application. These proposals will be submitted to the Compliance Committee for review and assessment and, where appropriate, approval.

The Compliance Committee will also gather information relating to enquiries, reports and incidents received, prepare any reports deemed necessary, and propose appropriate revisions to improve employees' application, understanding and awareness of the Code and its effectiveness.

In addition, following the periodic analysis of enquiries received, identified breaches and the results of monitoring activities, action plans and improvement measures may be established to address recurring situations, strengthen the organisation's ethical culture and promote compliance with the principles set out in this Code.

The Compliance Committee is committed to reviewing and assessing all contributions received with the aim of supporting the continuous improvement of both the Code and its application throughout the organisation..

13.4 Consequences of Non-Compliance with the Code

If a person subject to this Code breaches any of its provisions, the Compliance Committee will determine whether a breach has occurred and will subsequently instruct the Human Resources and Legal departments to apply the appropriate disciplinary measures in accordance with the internal disciplinary framework, the applicable collective bargaining agreement and applicable employment

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legislation.

Failure to comply with this Code of Ethics and Conduct may result in disciplinary action under employment law, without prejudice to any administrative or criminal penalties that may also apply.

14. Approval and Entry into Force

This Code originates from the Stakeholder Conduct Manual, approved in October 2015 and subsequently reviewed and updated in January 2018. In December 2021, the document underwent a comprehensive review, with substantial changes made to its content and its current title, Code of Ethics and Conduct, being adopted.

The resulting version was approved by the Advisory Board of BLENDHUB, S.L. on 10 December 2021 and entered into force on 13 December 2021.

The present version of the Code of Ethics and Conduct was approved by the Compliance Committee of BLENDHUB, S.L. on 27 October 2026 and entered into force on 28 October 2026.

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