

1. Purpose

Our Code of Conduct defines the values and standards by which Planasa Group conducts business. It is designed to provide Planasa Group's partners and employees/contractors with a clear understanding of the standards of conduct that pertain to our respective roles in the firm; the Code of Conduct is intended to be a road map to help guide our actions and behaviors at Planasa Group.

The nature of this Code is not meant to cover all possible situations that may occur. It is designed to provide a frame of reference against which to measure any activities. The Code of Conduct is complemented by other Planasa Group policies (see section 5) which go into more specific details of various topics. Employees/Contractors should seek guidance when they are in doubt about the proper course of action in a given situation, as it is the ultimate responsibility of each employee/contractor to "do the right thing", a responsibility that cannot be delegated.

2. Scope

This Code of Conduct applies to all employees, legal entities and business units belonging to the Planasa Group. This Code of Conduct also applies to those individuals who are bound, directly or indirectly, to Planasa Group through a consultancy or service agreement and who perform services in the name of Planasa Group or anyhow represent Planasa Group towards third parties in general and clients in particular. For the purpose of this Code of Conduct, those individuals are referred to as "contractor(s)".

This document should be read in conjunction with related Planasa Group policies, including policies Anti Bribery, Gifts and Hospitality, Conflict of Interest and Whistle Blowing. In the event of a discrepancy between this Code of Conduct and such policies, the more restrictive requirements will apply.

This is a mandatory document that must be translated for each country, under the responsibility of the Local Top Management.

3. Definitions

Planasa Group The group of companies directly or indirectly controlled by Tigriti, ITG, S.L.U.

4. Policies

4.1 INTRODUCTION AND OVERVIEW

4.1.1 INTRODUCTION AND GENERAL STATEMENT OF POLICY

We do the right thing

As Planasa Group employees/contractors, we are committed to the highest ethical standards in every aspect of our business operations. Exceptional performance and ethical behavior are intertwined. To succeed on the global stage, we must build our brand reputation with integrity. It is what has defined us in the past and continues to define us today.

As responsible employees/contractors, we must all be accountable not only for results, but also for the way in which the results are achieved. We must comply with this Code of Conduct (the "**Code**") as well as all applicable laws and

regulations everywhere that we do business. It takes a commitment to high standards from each one of us to ensure sustainable success.

4.1.2 RULES OF CONDUCT

4.1.2.1 Planasa Group Values

The Planasa Group values are so fundamental to our company that they make up our very name – **Planasa** with one another, our customers, shareholders, suppliers, competitors and the communities in which we live and operate; trust and fidelity in everything we do; and ideas and innovation to keep us moving forward.

Each of us is expected to demonstrate these values in our work and business relationships.

Planasa means caring about *what* we do, *how* and above all *why* we do it. We cannot provide the quality of service we do without caring about it.

Trust and fidelity means being trustworthy. We adhere to honesty, fairness and doing the right thing without compromise, even when circumstances make it difficult.

Constant ideas and innovation mean we always seek the best and very latest solution to a problem or situation to ensure that we always maintain the highest standards.

4.1.2.2 Purpose and application CEO

The Code sets the ethical standards for the way we conduct business. This includes dealing with other employees/contractors, customers, suppliers, shareholders, communities, governments and other business partners.

This Code highlights key issues and identifies Planasa Group policies and resources to help guide our decisions. It is by no means a comprehensive manual or contract that addresses every situation that we may encounter around the world.

When conducting business for Planasa Group, consultants and contractors are expected to observe the same standards of conduct as Planasa Group employees/contractors. They are expected to comply with the Planasa Group Code of Conduct and any other relevant Planasa Group Policy.

4.1.2.3 Additional responsibilities of managers

Managers are expected to lead by example. They are expected to drive a culture of integrity. Managers are responsible for promoting open and honest two-way communications. They must be positive activists and role models who show respect and consideration for each of our employees/contractors. Managers must diligently look for indications that unethical or illegal conduct has occurred and report it in a timely manner.

4.1.2.4 Personal responsibility and accountability

The Code helps us uphold Planasa Group's reputation. Each of us has the responsibility to abide by the Code, both by understanding the letter and spirit of its guidance, and by applying sound personal judgment.

We must continuously ask ourselves:

- i. Am I demonstrating a commitment to integrity?
- ii. Do I respect my business partners?
- iii. Would other employees/contractors say that I demonstrate a commitment to ethics?
- iv. Do I hold myself and others accountable for acting with honesty and openness in all business dealings?

4.1.3 WHEN YOU HAVE QUESTIONS

While it would be wonderful if the right course of action were always perfectly clear, things are not always obvious. Perceived pressure from managers or business demands are not excuses for violating the law.

When we have any questions or concerns about the legality of an action, we are responsible for checking with our Management, our HR Department and in some cases our Global head of tax & compliance.

Our open-door policy means we can approach any level of management with our concerns.

4.1.4 REPORTING BREACHES OF THE CODE

Employees/Contractors suspecting practices or actions believed to be inappropriate under this Code, or even illegal, should refer to the Planasa Group Whistle Blowing Policy.

Where appropriate, complaints may be made on a confidential basis or via email at the following address: ethicsline@Planasa.com.

All complaints will be properly investigated. In all instances, confidentiality will be maintained to the extent possible.

4.1.5 NON-RETALIATION

Retaliation against any employee/contractor who honestly reports a concern to Planasa Group about illegal or unethical conduct will not be tolerated. At the same time, it is unacceptable to file a report knowing it to be false.

4.1.6 VIOLATION OF THE CODE

Planasa Group is committed to be a good corporate citizen. The Company's principle is to conduct its business affairs honestly and in an ethical manner.

This Code provides a general statement of the expectations of Planasa Group regarding the ethical standards that each employee/contractor should adhere to while acting on behalf of the company. All our employees/contractors must conduct themselves accordingly and seek to avoid even the appearance of improper behaviour.

This Code applies to all managers, full and part time employees/contractors, contract workers, and anyone who conducts business with Planasa Group or in the name or on behalf of Planasa Group. Conduct in violation of this policy is unacceptable in the workplace and in any work-related setting outside the workplace. Any employee/contractor or contract worker who violates this Code will be subject to disciplinary action, up to and including termination of his/her employment.

4.1.7 INVESTIGATION PROCEDURES AND AUDITS OF COMPLIANCE

We are required to fully cooperate with all audits and investigations as requested by Planasa Group, government agencies and any supervisory body. All information provided must be truthful and accurate. We will not conceal, alter or destroy documents or records in response to an investigation or other lawful request.

4.2 WE CARE ABOUT OUR CLIENTS

4.2.1 CLIENTS SAFETY

PLANASA GROUP takes client safety very seriously and all Planasa Group staff are obligated to put the client first. To this end, Planasa Group has developed and implemented corporate protocols to deal with all key client safety issues related to our business. The entire client process has been thoroughly reviewed in order to develop protocols for all risk areas and mitigate these.

All relevant employees are required to be familiar with these protocols and receive any appropriate training they may need in order to be able to act upon them. Training is carried out according to a set schedule and will be repeated periodically if relevant.

4.2.2 POSITIVE CLIENT EXPERIENCE

Planasa Group is committed to providing a high level of service to all clients. The company is going to carries out a regular client satisfaction survey to monitor client satisfaction and improve the quality of service. It is the obligation of commercial department to distribute a certain minimum number of forms, which are then processed centrally to produce an unbiased result. Client Satisfaction Survey is followed up by extensive analysis of results and an improvement action plan for any areas of service that may have deteriorated since the previous round(s). Best practices are also shared in areas of improvement.

4.3 WE CARE ABOUT INTEGRITY

4.3.1 CONFLICT OF INTEREST

Planasa Group expects that all employees/contractors and anyone acting on Planasa Group's behalf shall act loyally and in the best interest of Planasa Group. All Planasa Group employees/contractors must avoid actual or apparent conflicts of interest in all their services for Planasa Group.

A conflict of interest exists when an individual acting for or on behalf of Planasa Group, and that individual's personal or family interest interfere or appear to interfere with the individual's decision making or business judgment on behalf of Planasa Group.

If a conflict of interest situation has occurred or if an employee/contractor faces a situation that may involve or lead to a conflict of interest, the employee/contractor shall refer to the Planasa Group Policy on Conflict of Interest.

4.3.2 HOSPITALITY, ENTERTAINMENT AND GIFTS

Anyone acting for or on behalf of Planasa Group shall not receive, solicit, offer or give gifts, monetary or other, or other advantages, such as hospitality and entertainment, that may influence or are suited to influence the integrity or independence of any business decision. Further guidance is included in the Planasa Group Policy on Gifts and Hospitality.

4.3.3 PROTECTION OF CONFIDENTIAL AND PROPRIETARY INFORMATION

Planasa Group's policy is to respect the confidential and proprietary information of third parties and not to engage in unethical, improper or illegal means to obtain the confidential information or proprietary data of third parties.

4.3.4 ANTI-TRUST

Planasa Group believes in the free market economy and wants to compete in a prudent and ethical manner within the anti-trust and competition legislation that apply on the markets Planasa Group operates in, both regarding supplier and customers.

Competition and anti-trust laws impact on Planasa Group's business dealings on all sides; supply, production, distribution and sale. Violation of the rules will have an impact on Planasa Group and anyone acting on behalf of Planasa Group. They will be severely sanctioned.

4.3.5 ECONOMIC SANCTION LAWS, EXPORT CONTROL

Planasa Group complies with any economic trade and sanctions law, such as boycott laws and export controls and anti-money laundering laws that are imposed by local authorities.

Certain countries have and may in the future impose economic and trade sanctions against elected countries to further foreign policy, national security and other objectives and Planasa Group must comply with any such laws, any export control laws and regulations in its business operations and Planasa Group expects its employees/contractors to adhere to this policy.

4.4 WE CARE ABOUT OUR COLLEAGUES

4.4.1 INAPPROPRIATE BEHAVIOUR

Abusive, harassing or offensive conduct is unacceptable, whether verbal, physical or visual. Examples include derogatory comments based on gender, racial or ethnic characteristics, and unwelcome sexual advances. We are encouraged to speak out if a co-worker's conduct makes us or others uncomfortable and to report harassment if it occurs. Threats or acts of violence or physical intimidation are prohibited. To protect the safety of all employees/contractors, each of us must be free from the influence of any substance that could prevent us from conducting work activities safely and effectively.

4.4.2 HEALTH AND SAFETY

We are all responsible for maintaining a safe workplace by following safety and health rules and practices. We must immediately report accidents, injuries and unsafe equipment, practices or conditions to a supervisor or other designated person. Planasa Group is committed to keeping its workplaces free from hazards.

4.4.3 EQUAL OPPORTUNITIES

We always treat each other with respect and fairness, just as we wish to be treated ourselves. We value the differences of diverse individuals from around the world. Employment decisions are based on business reasons, such as qualifications, talents and achievements, and follow local and national employment laws.

4.5 WE CARE ABOUT OUR SHAREHOLDERS

4.5.1 PROTECTION OF COMPANY ASSETS

Planasa Group's property and equipment must be treated in a proper manner and only be used for its intended purpose. The removal or borrowing of any Planasa Group property and equipment is forbidden and private use of Planasa Group equipment shall be in accordance with the agreed procedures for such use.

4.5.2 HANDLING OF PLANASA GROUP'S CONFIDENTIAL AND PROPRIETARY INFORMATION

Confidential information consists of any information that is not or not yet public information. It includes trade secrets, business, marketing and service plans, client personnel and clinical data, customer insights, engineering and manufacturing ideas, designs, databases, records, salary information and any non-published financial or other data.

Planasa Group's continued success depends on the use of its confidential information and its non-disclosure to third parties. Unless required by law or authorized by their management, employees/contractors shall not disclose confidential information or allow such disclosure. This obligation continues beyond the termination of the employment.

Furthermore, employees/contractors must use best efforts to avoid unintentional disclosure by applying special care when storing or transmitting confidential information.

4.5.3 BOOKS, RECORDS

Planasa Group shall maintain reasonably detailed books, records and accounts in accordance with any relevant legal requirements. All accounting information must be correct, registered and reproduced in accordance with applicable laws and regulations, including generally accepted accounting principles.

4.5.4 RESPONDING TO INQUIRIES FROM THE PRESS/OTHERS

We strive to provide fair, accurate, timely and easy-to-understand information to the public. Unfortunately, many well-intentioned interviewees have had their stories misinterpreted by reporters. Let the experts handle such situations, always forward requests from the media to your manager for appropriate action and abstain from any comments or statement.

4.6 WE CARE ABOUT OUR SOCIETY

4.6.1 PLANASA GROUP'S SOCIAL RESPONSIBILITY STANDARDS (INCLUDE ETHICAL PURCHASING)

It is Planasa Group's policy to conduct business in compliance with the law and widely accepted norms of fairness and human decency, and we require our suppliers to act similarly.

As a condition of doing business with Planasa Group, we expect suppliers to conform to these requirements and expect their sources in the supply chain to do so as well. We will assess conformity to these requirements and will consider a supplier's progress in meeting these requirements and their ongoing performance in making sourcing decisions.

4.6.2 HUMAN RIGHTS

Planasa Group recognizes the Universal Declaration of Human Rights as a common standard of achievement for all peoples and all nations, to the end that every individual and every organ of society, keeping this Declaration constantly in mind, shall strive by teaching and education to promote respect for these rights and freedoms and by progressive measures, national and international, to secure their universal and effective recognition and observance.

4.6.3 ANTI-BRIBERY LAWS

Planasa Group stands against all forms of bribery and corruption and complies with anti-corruption laws and regulations that are applicable where Planasa Group does business.

No matter which country you operate from, you will be subject to laws that severely sanction any attempts to, directly or through intermediaries, influence public officials by offering them advantages of any kind. Bribery laws can vary between countries but the general definition of "public officials" tends to include officials (and their family members) of international and national organisations, members of political parties, state-owned companies or state-owned non-profit organisations.

4.6.3.1 Bribery or corruption

Any form of bribery or corruption will harm Planasa Group and Planasa Group's reputation and will not be tolerated. Employees/Contractors must strictly adhere to the Code and with the applicable legislation and Planasa Group Anti-Bribery Policy when engaging with public officials. In case of doubt, any question should be referred to your manager or the Global head of tax & compliance.

4.6.3.2 Hospitality, Entertainment and Gifts

The offer and acceptance of entertainment, hospitality and gifts must always comply with this Code and Planasa Group Gifts and Hospitality Policy and be undertaken in accordance with applicable laws and acceptable good business practice. Such offers must never be promised, offered or provided for the purpose of influencing any decision by a commercial customer or public official to assist Planasa Group to obtain or retain business or seek an improper advantage. Entertainment, hospitality or gifts that are promised, offered or made for improper purposes may violate applicable anti-bribery and corruption laws and are strictly prohibited.

4.6.3.3 Political or Charitable Contributions

Contributions by Planasa Group to political parties are generally subject to legal restrictions and disclosure requirements. Planasa Group in general does not give political contributions, and any proposed political contributions must be considered as highly sensitive and will require particular detailed scrutiny and the highest approvals, as detailed in the Planasa Group Levels of Authority and Reporting, prior to any commitment being made.

Charitable contributions are in general permissible provided that no conflict of interest exists with Planasa Group or any Planasa Group employee/contractor.

4.6.4 RELATIONSHIP WITH THIRD PARTIES

4.6.4.1 Intermediaries

Before entering into business relations with intermediaries, including agents, consultants and others who represent or act on behalf of our company, Planasa Group must ensure that the intermediary's reputation, background and abilities are appropriate and satisfactory by conducting due diligence as further described in Planasa Group's policies.

Planasa Group expects that intermediaries act in accordance with the requirements set out in this Code and this requirement shall be reflected in the written contract that must be entered into with any intermediary.

Agreements with intermediaries shall be in writing and express the true relationship between the parties.

The agreed compensation shall be appropriate for the legitimate service rendered by the intermediary. Payments may only be made against satisfactory documentation and be accounted for in accordance with generally accepted accounting principles.

4.6.4.2 Agents/suppliers/customers

Considering the nature and scope of the relevant agreement, agency, collaboration, supply, joint venture agreements and other agreements should, to the extent possible, contain explicit obligations on the third party to comply with relevant anti-bribery laws and other local regulations.

4.6.5 COMPLIANCE WITH ANTI-MONEY LAUNDERING AND ANTI-TERRORISM LAWS

All employees/contractors of Planasa Group are required to comply with all applicable anti-money laundering and anti-terrorism laws and regulations.

Money laundering is generally defined as conduct designed to disguise proceeds of criminal activity; and may include or involve, amongst other things, making illegal or improper payments to public officials, the misappropriation, theft or embezzlement of public funds by any party, as well as by or for the benefit of public officials, paying kickbacks to employees/contractors of private companies, and creating schemes to defraud third parties.

Money laundering may also involve efforts to evade reporting requirements by engaging in a series of funds transfers that individually are below the amount requiring disclosure. Funds may also be laundered by transfers amongst bank accounts or through the purchase of apparently legitimate assets. Even though they have been "laundered", these funds still represent the proceeds of criminal activity, and knowingly receiving, transferring, transporting, retaining, using, or hiding such criminal proceeds is illegal.

Planasa Group may be a target for persons or entities who want to make the proceeds of criminal activity appear legitimate. For example, companies that offer to do business with Planasa Group may in fact be fronting money laundering or criminal activity. Similarly, agents, customers or other parties may seek to have Planasa Group wire their fees to other jurisdictions than those where they reside to avoid laws and requirements in the home country. It is therefore essential for Planasa Group to know the parties with whom it conducts business and perform the due diligence required by the Code with respect to all possible business partners, representatives, agents, government service providers and high-risk suppliers.

4.6.6 PROTECTION OF THE ENVIRONMENT

We are committed to protecting the environment and operating our businesses in ways that foster sustainable use of the world's natural resources. We respect the environment by complying with all applicable environmental laws in all countries in which we conduct operations. We notify management if hazardous materials meet the environment or are improperly handled or discarded.

4.7 CERTIFICATE OF COMPLIANCE

All employees' contractors/ consultants acting on behalf of Planasa Group, shall when commencing employment or entering a contract with Planasa Group, and annually thereafter certify that:

- a) he/she has read and understood the Code (and the Policies);
- b) he/she has not paid any bribes, facilitation payment or in any other way been involved in corruption;
- c) he/she has not violated the Code of Conduct; and
- d) he/she has no knowledge of any violations of the Code without having notified Planasa Group or the Global Head of Tax and Compliance.
- e) he/she understands that violations of this Code of Conduct, applicable laws and regulations may result in disciplinary actions, including termination of employment.

This certificate shall be signed by the employee's contractors/ consultants according the form approved for that.

4.8 AUDITS OF COMPLIANCE BY PLANASA GROUP

The Board of Directors will supervise the Code of Conduct and conduct reviews of compliance with the Code by its subsidiaries, affiliates and joint ventures. The findings of the reviews shall be reported to the Supervisory Board of Planasa Group.

The Planasa Group Code of Conduct might be amended by Planasa Group from time to time. Employees/Contractors will be informed of these updates and can at any time require a copy of the Code of Conduct from Planasa Group Global head of tax & compliance.

5. Related Documents

PG-C-002	Anti-Bribery
PG-C-003	Gifts and Hospitality
PG-C-004	Conflict of Interest
PG-C-005	Whistle Blowing

Approval

Prepared by:	Approved by:	Date of approval:
Global Head of Tax & Compliance	Planasa Group Management Board	July, 2019