

CODE OF CONDUCT

INTRODUCTION

Founded in 2011, Tritium Software, S.L. (hereinafter, "Tritium Software") has developed a CRM for sales teams and is currently a sales leader in the market. It has a team of nearly 100 professionals dedicated to transforming industry through technology and it has clients in more than 36 countries.

This Code of Conduct sets out the **corporate values of Tritium Software and the companies belonging to the same group (hereinafter collectively referred to as "ForceManager")** and translates them into commitments, policies and behaviours as a framework for action in certain situations that everyone working at ForceManager is expected to follow. It is therefore the concrete expression of ForceManager's culture and values.

The Code is a statement of good practice and fundamental principles of professionalism, integrity, honesty and respect for the law, which also helps us to improve on what we are already doing well. Business ethics is a fundamental building block to protect our integrity and to continue to do business and conduct our business in a responsible manner, as well as to contribute positively to the society in which we live. The Code is ultimately a reflection of ForceManager's **commitment to acting ethically and responsibly** in all its business activities.

The Code is therefore addressed to all directors, executives and employees at ForceManager, whether at its headquarters or at its subsidiaries. ForceManager will also encourage its suppliers, clients and partners to adapt their behaviour to similar standards to those defined in this Code of Conduct.

Compliance with the Code is therefore a **shared responsibility**. We all have a role to play in respecting our ethical values and policies. The Code unites us all, in diverse places and with diverse cultures, to follow a common vision.

OBJECTIVE

ForceManager's Code of Conduct aims to establish the **values that must guide the behaviour** of its employees in order to create a corporate culture that directs the relationships between its employees; their actions with clients, partners, suppliers and collaborators; and their relationships with authorities and public bodies and with society in general.

OUR VALUES

Our work philosophy is based on detecting the needs of our clients through a direct relationship with them, committing ourselves to their needs and applying the simplest possible solutions that guarantee the proposed results and their satisfactory experience. In order to achieve these objectives in a market as dynamic as ours, we understand that clear and strong values are necessary to be and remain at the forefront.

To do this, it is important to be enterprising, take risks and come up with creative solutions.

ForceManager does at the same time strive to promote a culture that fosters a creative work environment and a work-life balance.

ForceManager values are as follows:

1. We are ONE team

- Without silos, we are all in the same boat and working together towards the same goal.
- Equal opportunities regardless of location
- All team members should be treated with the same respect regardless of their place in the organisation.
- We contribute our opinion and actively listen to our colleagues.

2. We have a positive mindset

- We always have a positive attitude towards work and life; and if we fail, we fail going forward.
- While some people complain, we solve problems and get things done.

3. Our users come first

- We help real people, our users ... If they are unhappy and unsuccessful with ForceManager, they will complain to their managers and stop using us.

4. Adoption and simplicity are our mantras

- Adoption is everything in SaaS: if the sales team doesn't use our solution, it's worthless.
- Everything we do should be done in order for the ForceManager solution to be adopted (and in a way that is measurable). Without adoption there is no value.
- Simplicity is a big part of our value proposition and, at a product level, it is directly related to adoption. Let's keep the solution and its functionalities simple, easy and smart at all levels. If we have a simpler solution to a problem, this is the right one.

5. We are the CEOs of what we do

- Each of us owns everything we do.
- Being a CEO is not a role, it is a vital attitude, with a passion for life and work.
- Before taking any action or making any decision, ask yourself: what would you do if you were the CEO of ForceManager?
- We are responsible, we finish what we start and we do what we say.

6. We have fun together

- We enjoy what we do, we learn, we have fun and we enjoy our team.
- This is not just a job; it is a life experience.

COMMITMENTS, POLICIES AND BEHAVIOURS

Our Code of Conduct outlines the set of corporate values in force in all countries where ForceManager operates, setting out policies and behaviours that affect the daily working lives of the ForceManager team.

This Code sets out the behavioural guidelines that we must follow to align our conduct and objectives with ForceManager's values. All of us at ForceManager must conduct ourselves with respect for the applicable laws and regulations, with integrity and transparency, with the prudence and professionalism that corresponds to the social impact of our activity and the trust that our investors, partners and clients have placed in us.

If in a particular situation a question arises as to how to proceed, the following questions should be asked: Does it violate any laws or regulations, is it contrary to ForceManager's values, standards or policies, and if my behaviour were to be made public, would it be considered inappropriate or unprofessional?

We will now describe and explain the **policies and behaviours** that reflect our **commitment to acting responsibly, ethically and legally** and that should guide us in resolving any conflict situation. If you are still in doubt, you should consult your line manager or the People Department.

1. COMMITMENT TO DOING BUSINESS ETHICALLY AND RESPONSIBLY

At ForceManager we are committed to **doing business with integrity, fairness and diligence**, respecting applicable laws and business regulations as well as the fundamental ethical principles described in this Code of Conduct, always maintaining a respectful and collaborative attitude towards colleagues, suppliers, clients and other professionals and avoiding conflict situations.

a) Respect for legality and ethical values:

- We will respect and ensure compliance with the laws of the countries in which ForceManager does business.
- We will comply with ForceManager policies and procedures.
- We will work in accordance with ForceManager's corporate values, which should be used as a guide to resolve any conflict situations.

b) Transparency in communication:

- We will maintain honest and transparent communication, both internally and externally
- Where required by applicable law, we will provide the relevant public authorities and agencies with all the necessary business information to ensure it is true, clear and accurate.
- We will inform investors in a timely, truthful, transparent and objective manner.

c) Fair competition

- We will compete fairly with other companies on the premise of mutual respect among competitors.
- We will avoid any misleading, fraudulent and deceptive conduct that may harm others.
- We will avoid any conduct that involves altering or simulating documents or contracts that may imply the involvement in an activity of persons who have not actually taken part in it, or any that may attribute statements or declarations to those who have taken part in it that are different from those they have made, as well as misrepresenting the truth in narrating events.
- We will avoid any conduct that violates or may appear to violate antitrust, competition and fair trading laws, and especially:
 - We will establish an independent commercial policy whereby we will not enter into agreements with our competitors, either formally or informally, to fix prices, or to divide or allocate markets, geographic regions, clients or sources of supply.
 - We will not share or exchange confidential or competitively related information with our competitors, such as information about prices and costs or other business conditions, future strategies, plans or schedules related to product and/or service development and/or business strategy.
- We will consult with the Legal Department on any agreement or contract that may involve unfair practices.

d) Corporate image and reputation

- We will work with integrity and transparency, avoiding practices or behaviour that may give the impression of improper behaviour or that may damage ForceManager's reputation or good name

e) Auditing

- We will maintain transparent and honest corporate governance to maintain the confidence of our investors and partners.
- We will comply with applicable laws and regulations governing financial accounting and report appropriately to government authorities, investors and the public
- We will reflect all business transactions in ForceManager's annual accounts with absolute accuracy, in accordance with legally required auditing procedures and standards
- We will implement the necessary measures to ensure the security and confidentiality of accounting records.

- Before signing a document or approving a transaction, we will check the data and the integrity of the information.

f) Money laundering:

- We will not promote, facilitate, participate in or conceal any transaction that could reasonably be expected to involve money laundering, nor will we engage in any transaction involving property that could reasonably be presumed to be the proceeds from unlawful activities
- We will report any transactions that may involve money laundering or that are the proceeds of illicit activities.

g) Anti-bribery and anti-corruption measures.

- We will not offer anyone (regardless of whether they form part of public authorities), directly or indirectly, any form of gratification, bribes, gifts, remuneration or any other form of compensation, including the improper exchange of money, loans, special privileges, personal favours, benefits or services.
- We will not pay any commissions other than the usual commercial commissions in the course of business to obtain advantages even where this is legally permissible and customary practice, except in exceptional circumstances that may justify such payments.
- We will not accept gifts, donations, discounts, invitations or any other form of similar hospitality from any third party unrelated to ForceManager, with the exception of complementary gifts or donations that correspond to normal business practice in the course of business according to the current law. This prohibition extends to spouses and first-degree relatives of ForceManager employees.
- If you are in any doubt about offering or receiving any kind of gift, reward or compensation, or if you receive any kind of pressure, coercion or extortion intended to influence your decision, you should report it to your line manager or the People department.

h) Loyalty to the company and conflicts of interest:

- We will avoid any conflicts of interest that may influence our professional performance.

A conflict of interest exists when a personal or family situation, related to friendship or any other external circumstance may affect our professional objectivity and our duty to act in the best interests of ForceManager and our clients. These situations include, in particular, those with family members and spouses, investors and partners.

- In the event of a potential conflict of interest, we must inform our line manager or the People department, refraining from acting in the event that a conflict of interest is confirmed or by signing a "Declaration of absence of conflict of interest" if this is not the case.

i) Quality:

- We will carry out our work with the aim of achieving the highest standards of quality in our products and services for the benefit of our clients, adopting best practices and guided by a deep understanding of our clients' needs.

j) Individual responsibility and involvement:

- We will work in an enterprising way and participate responsibly in projects and decision-making processes to achieve ForceManager's goals.

2. COMMITMENTS IN DEALINGS WITH CLIENTS, SUPPLIERS AND SOCIETY

At ForceManager we are committed to maintaining **productive, ethical and transparent relationships with third parties**, whether they are employees, suppliers, clients or any other person unrelated to ForceManager, and we expect them to comply with all applicable laws and regulations, as well as to share the values set out in our Code of Conduct.

a) Customer relations

- We will propose the products and services to our clients that best suit their needs and available budget, avoiding making any demands.
- We will act with due professional competence and dedication to the project tasked for each client, offering all the necessary and appropriate information to facilitate the implementation of our solution and associated services.
- We will deal quickly and efficiently with the complaints of our clients and users, seeking their satisfaction beyond the mere fulfilment of what has been strictly purchased.
- We will provide action plans and continuous improvement in order to achieve the full satisfaction of our clients and users.

b) Relations with suppliers, partners and collaborators

- We will select suppliers, partners and collaborators on the basis of suitability and quality guarantees and the provision of their products or services, as well as their price, delivery conditions and quality, not accepting or offering gifts or commissions, in cash or in kind, that may alter the rules of free competition in the production, distribution and/or provision of goods and/or services.

- We will communicate our Code of Conduct to our suppliers, partners and collaborators and encourage them to adhere to the same standards and values as ForceManager and we will only select those whose business practices respect human dignity, do not violate the law, share our principles of ethical behaviour and do not jeopardise the reputation of the company.

c) Relations with Public Authorities

- We will avoid improperly influencing any authority, public official or person holding public office in order to obtain decisions from them that are favourable to ForceManager's interests.

d) Relations with society

- We will respect human and universal rights interpreted in accordance with international law and practice, in particular the United Nations Universal Declaration of Human Rights and the principles proclaimed by the International Labour Organisation.
- We will preserve and protect the environment through practices that promote its conservation and sustainability (zero paper policy, responsible water consumption, turning off electronic devices when not in use, recycling of technology consumables and paper, etc.).

3. COMMITMENT TO HONEST AND RESPECTFUL DEALINGS WITH PEOPLE

At ForceManager, we are committed to maintaining **respectful, honest and upright relationships** with everyone we interact with, whether they are ForceManager employees or third parties.

a) Honest and respectful treatment

- We will maintain all personal relationships on the basis of mutual respect, sincerity, honesty and a spirit of trust and cooperation, without discriminating against anyone on the grounds of birth, race, sex, religion, opinion, speciality or any other social or personal condition or circumstance, and taking into consideration their different cultural sensitivities.
- We will ensure an atmosphere of mutual respect at work that excludes any form of violence, intimidation, hostility, humiliation, harassment or abuse - whether sexual or purely personal - or discrimination on the grounds of ideology, religion or belief, ethnicity, race or nation, gender, sexual orientation, illness or physical or mental disability.

- We will avoid verbal or written insults against any person or group of persons, whether or not they are present, as well as words, gestures or manners that are gross or disrespectful to others.

b) Effective equality

- We will ensure non-discrimination on the basis of race, religion, age, nationality, gender, pregnancy status, or any other personal or social situation unrelated to the conditions of merit and ability, providing equal opportunity to all employees at any stage of their employment relationship with ForceManager (including selection, hiring, compensation, job assignments, promotion and termination).

c) Working conditions, safety and health at work

- We will ensure health and safety at work by adopting and respecting all reasonable measures to maximise the prevention of occupational hazards.
- We will promote health care as a key element of sustained productivity and the quality of our services and we will minimise accidents at work and occupational diseases.
- We will promote the delocalisation of work, supporting teleworking as the best way to reconcile work with personal and family life.
- We will avoid work-related telephone communications and digital messaging outside working time and working hours in order to ensure rest time and to respect personal and family life.

d) Cooperation and dedication

- We will promote the exchange of ideas and initiatives to establish a fair and open debate in the diversity of opinions, fostering a team spirit with an open mind.
- We will encourage the professional development, training and promotion of employees.
- We will facilitate employee participation in the company's social action programmes.
- We will respect the right of employees and collaborators to participate in any non-professional activity or in political associations or parties, or any other economic, social or cultural institutions, as long as this does not interfere with the performance of their duties or compromise ForceManager's public image.
- We will guarantee employees' rights to freedom of association, to form a union and to collective bargaining.

e) Protection of personal data

- We will ensure the maximum security of personal data belonging to employees, clients, users and suppliers by means of appropriate security measures and we will use them for the purposes for which they are intended.
- We will use appropriate safeguards to prevent unauthorised use of confidential documentation or disclosure of personal data.
- We will immediately report any security breach that may occur.
- At no time will it be permitted to take possession of, use or modify without authorisation, and to the detriment of a third party, any personal or family data belonging to another person that are recorded in computer, electronic or online files or media, or in any other type of file or record, or to access them by any means or alter or use them to the detriment of the owner of the data or of a third party.

4. **COMMITMENT TO THE PROTECTION OF RESOURCES AND ASSETS**

ForceManager is committed to **using ForceManager assets responsibly**, keeping them in perfect working order and ensuring their usability and protecting them from malicious or unauthorised access.

a) Computer systems

- We will make appropriate and efficient use of computer and technological resources and assets (laptops, mobile phones, screens and other accessories) made available to us for the performance of our professional activity, avoiding using them for private purposes except for occasional use that should be moderate, proportional to the circumstances and not detrimental to ForceManager.
- We will not install, use or distribute software that may affect the security of systems, or make unauthorised copies or perform actions that could allow the entry of viruses or *malware*.
- We will implement internal rules and policies for the use of computer assets and resources.
- We will protect computers with passwords that we must change frequently.
- We will take reasonable steps to prevent the loss, theft, damage or waste of computer assets and resources.

b) Intellectual property

- We will respect distinctive signs, *copyrights* or any form of intellectual and/or industrial property rights belonging to ForceManager as well as courses, projects or programmes,

information systems, processes, technology, *know-how*, customer information, products, corporate strategies and operations, using them only for ForceManager's own professional purposes.

- We will respect the intellectual and industrial property rights of third parties' products and services.
- We will report any practice whose purpose includes the commission of an intellectual and/or industrial property crime, in particular if it is a computer-related crime.

c) Confidential and privileged information

- We will not use data, documents, privileged, strategic or confidential information or business secrets that we learn of as a result of our professional activity to obtain a personal financial advantage, nor will we provide it to third parties so that they can obtain the same type of advantage.
- We will not allow unauthorised persons to gain access to privileged, strategic or confidential documents, data or information.
- We will maintain data, documents and computer files in an orderly and complete manner so that any employee can replace another at any time.

d) Social media

- We will respect the internal rules of behaviour in social media when publishing ForceManager information or opinions, looking after the information shared and using good judgement and common sense.

DISSEMINATION, ACCEPTANCE AND COMPLIANCE WITH THE CODE OF CONDUCT

The content of this Code of Conduct will be communicated and disseminated to all current and future ForceManager employees, as well as to its suppliers and collaborators, for their acceptance and commitment to comply with it in order to avoid practices that may lead to illegal conduct, impressions of improper behaviour or damage to ForceManager's reputation.

Compliance with the provisions of this Code is an essential part of the contractual obligations of employees, so that, without prejudice to any other liability to which it may give rise, failure to comply with the rules and guidelines contained in it may lead to the adoption of disciplinary penalties that may be applicable in accordance with the provisions of the relevant employment legislation.

Nobody may ask the people this Code applies to to violate the provisions of this Code and no employee may justify misconduct on the grounds of ignorance of this Code or an order from a superior.

TRAINING AND REVIEW OF THE CODE OF CONDUCT

ForceManager will take the necessary training actions to ensure that all employees are sufficiently aware of this Code of Conduct and its contents.

The Code will be reviewed periodically to adapt it to changes in legislation and new circumstances.

NON-COMPLIANCE AND REPORTING

If you detect any anomaly, a possible failure to comply with this Code of Conduct or simply when any action or way of proceeding does not seem correct to you, you should immediately report it either to your immediate superior or anonymously through the Whistleblowing Channel (canaldenuncias@forcemanager.net).

By promptly reporting potential breaches, you help ForceManager to address potential problems before they adversely affect the company financially, legally or reputationally, and to enable ForceManager to take appropriate measures and legal action to defend itself.

ForceManager guarantees that there will be no retaliation against employees who, in good faith, report potential compliance issues, ensuring that reports made on the Whistleblowing Channel are kept confidential, with no request for the name or any other information identifying the whistleblower.

CONCLUSIONS

1. We will respect the laws of the countries in which we do business and comply with ForceManager's policies and procedures.
2. We will maintain the highest ethical standards in our business dealings, always acting with sincerity, fairness, integrity, free competition and transparency.
3. We will foster a culture of honesty through mutual respect, collaboration and trust in others.
4. Each and every one of us will be held accountable to this Code and, if we become aware of possible breaches, we will report them immediately