



Intive

Code of Conduct

January 2024



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A message from the CEO



Dear intivers,

Being a fast-growing global technology company is both challenging and exciting. In over 20 years, we have grown into a large, significant organization spanning Europe, Asia, and the Americas. As drivers of digital excitement, we innovate with customers across many industries and help them thrive in today's fast-changing world.

Such a broad footprint calls for responsibility. As we strive to make our work sustainable, this Code of Conduct reminds us how to navigate in our everyday tasks. It's based on our core values and reflects our respect: for each other, our business partners, international laws, company assets and the environment.

We have all the crucial ingredients required for success: dedicated professionals, great customers, and the exceptional digital solutions we build for them. We're in this together.

Thank you for putting integrity first.

**Sincerely,
Diego Rubio**

A handwritten signature in black ink, appearing to read 'Diego Rubio', with a stylized flourish at the end.





Company culture

Who are we as intive?

We believe that **excitement** is key to delivering ground-breaking products. Combining design, engineering and digital enthusiasm, we **drive business transformation** through unique customer experiences.

We value **Empathy, Agility** and **Enthusiasm** in everything we do. Empathy translates into paying close attention to another person's perspective, whoever they might be. Our Agility and Enthusiasm turn our projects into fascinating journeys that transform our customers' businesses, our peoples' professional paths and intive itself.

We want to feel fulfilled. Professional satisfaction paired with an open working culture are two important factors behind our most successful projects. We believe in learning, sharing knowledge, and ensuring that ideas have the space to grow at intive.

We want our customers to enjoy all the benefits of going digital. We treat each project like an exciting digital adventure, building upon partnership, trust and respect. We listen carefully, consult and provide services and solutions that challenge the status quo.

Business and business culture have a real impact. We're responsible for how we run our business and how it affects peoples' lives and shapes the future. As drivers of digital excitement, we innovate to change the world for the better.

CORE COMPANY VALUES

We act with Empathy, Agility and Enthusiasm, discovering our partners' needs, adjusting to continuous change and welcoming positive curiosity.

HUMAN CENTRICITY

We stand for a human-centric approach to software engineering, connecting deep industry expertise, user-centric design, and cutting-edge technologies. This is how we drive innovation for our customers and co-create the most powerful digital experiences.

SUSTAINABLE IMPACT

We strive to be the most exciting technology partner for our customers. By focusing on developing people-centric digital products, we transform businesses and positively impact users as well as society.

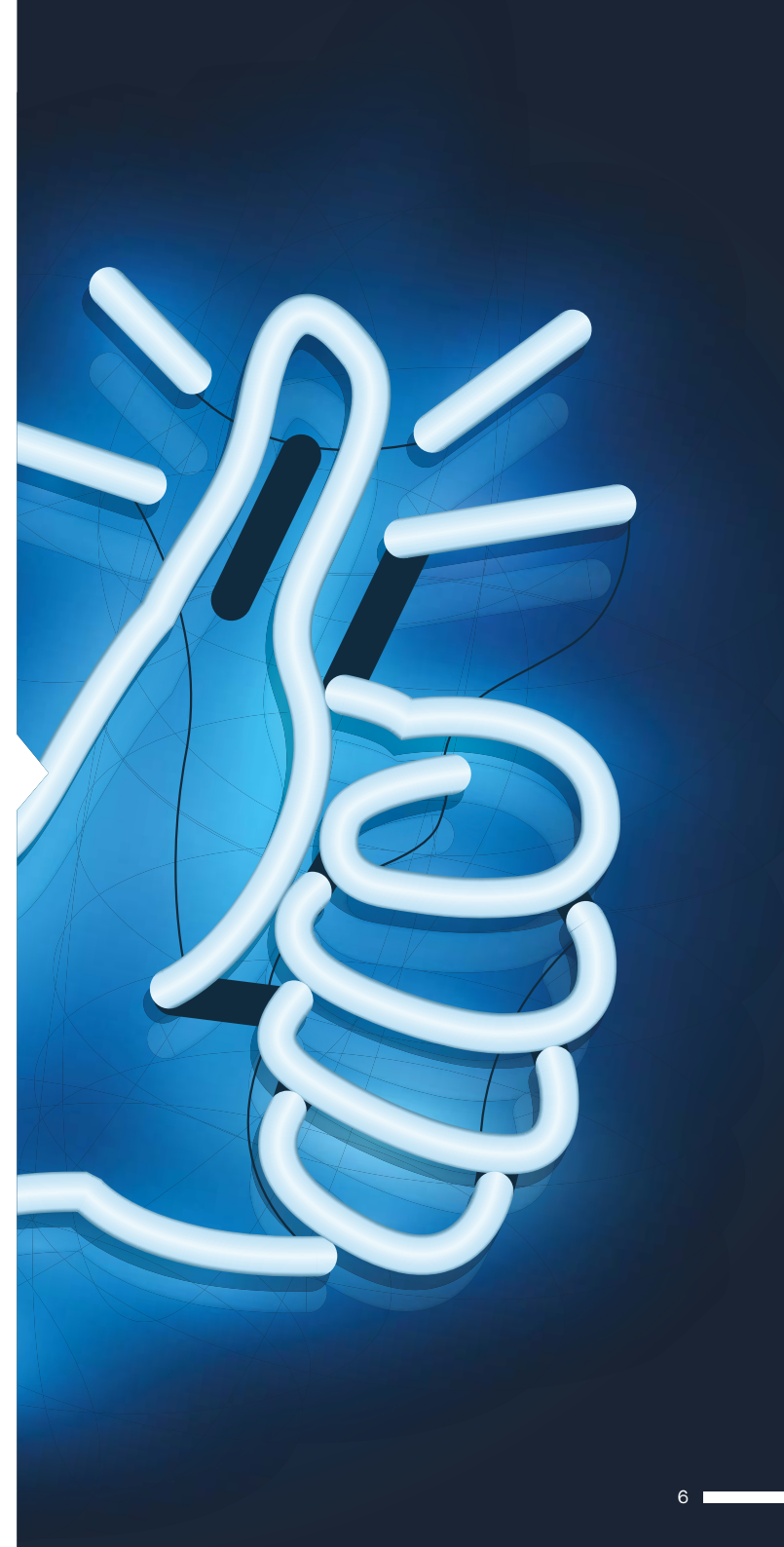
Why does acting good matter?

intive is us and, at the same time, **we're all much more than intive**. We come from different backgrounds, carry diverse experiences and enrich the company with our unique stories. Together, we develop an organization that grows with us and thanks to us.

We never ask newcomers to embrace **Empathy, Agility** and **Enthusiasm** when joining the company – **those who join us, already embody these values**. What we ask from our people is holding on to them, at all times and in all professional situations.

The way we act as intivers matters just as much as the services and solutions we provide. We don't make up the rules as we go along – we foster a business and a working culture based on **trust and respect** for each other, our business partners, suppliers, all applicable laws and regulations, our assets and the environment.

As a company, we're only as reliable and fair, as the decisions we make in our everyday work. By being in line with this Code of Conduct, intivers build the company's over 20 years history and turn the organization into **a better business partner**, employer and a socially responsible entity, task by task, project by project.



How does the Code of Conduct work?

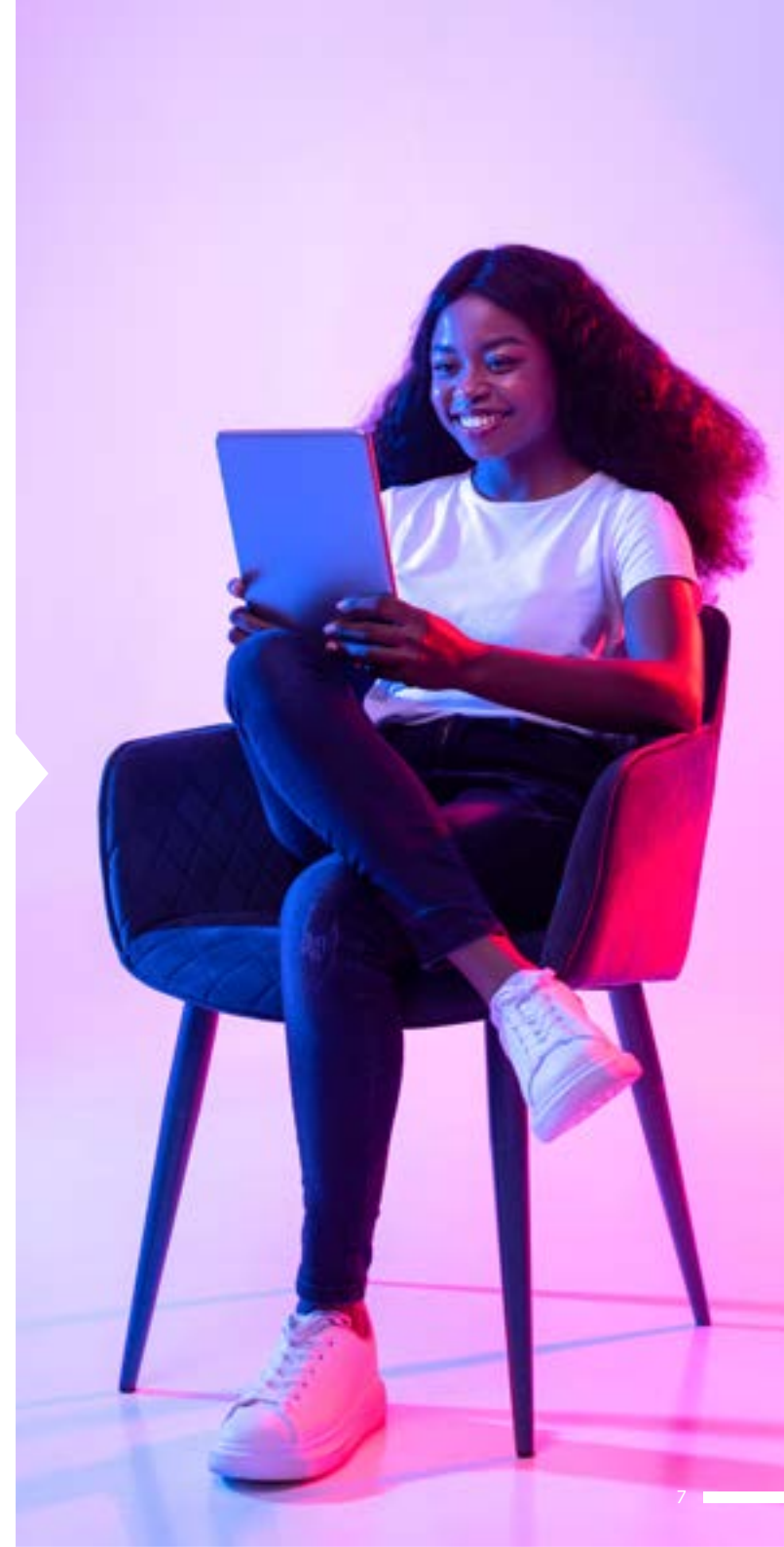
The **intive Code of Conduct** came into force on 06/28/2019 and is a living document revised regularly to reflect our **professional standards** and address **current regulations** that impact our business.

This Code is based on our core values and provides **guidance in professional** situations. The principles we embrace promote integrity throughout our business activities.

The Code does not describe every possible situation that might occur in the workplace. The document **serves as a guidepost** for intivers to address the **doubts** they may **have as to how to act in specific work-related circumstances** to remain compliant with the company's **values**.

The Code of Conduct is applicable to all the legal entities that form the intive group, all intivers (employees, board members and contractors acting as sole practitioners) as well as others who temporarily work or provide services for or on behalf of intive.

While all of us are expected to act ethically and responsibly, **each manager at intive is obliged to serve as a good role model** and promote ethical behavior in his or her unit.



What are the general principles?

Follow the intive values

Empathy, Agility and Enthusiasm make us act with care, focus and engagement. Be honest, fair and always willing to support an open and friendly working environment for all of us.

Embrace our key attitudes

Teamwork is easy when you believe in people, listen carefully, seek common ground, stay open, aim high, take ownership and let your colleagues do the same. Your mindset makes all the difference.

Don't hesitate to speak up

At intive, taking action is important – we stand against any form of misbehavior in our professional environment. Report what you believe is a violation of our Code, values, procedures or the law.

Respect applicable laws and regulations

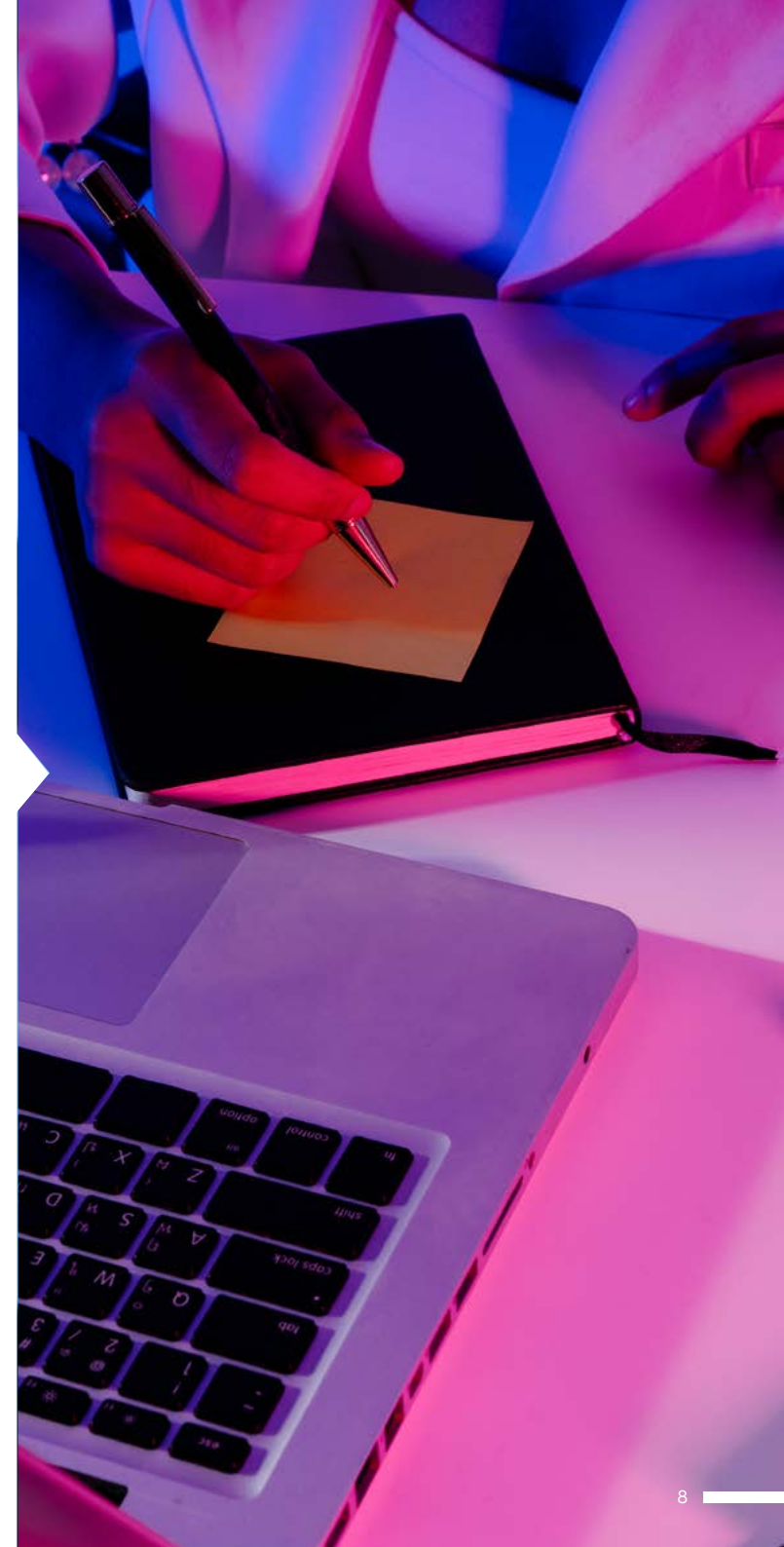
Doing the right thing requires obeying the law and internal regulations. Make sure you know the applicable laws and always act with the best practices and high standards in mind.

Take good care of our business partners

Building trust takes years; losing it can happen in a day. Always act responsibly, respect confidentiality and keep in mind the partner's perspective and values.

Safeguard company assets

intive trusts us with the Group's physical assets, confidential information, intellectual property and also environmental resources. Act with care and attention, in whatever you do.



Why is speaking up so important?

All our actions matter and become part of the bigger picture. All our doubts and concerns should be addressed and treated with care. We're committed to a **culture of openness and transparency** – the sooner a problem is recognized and communicated, the faster it can be resolved. That's why we value feedback and learn to listen. Every day.

If you have any doubts whether your or other people's conduct is in line with our Code, values or other regulations, your **Line Manager** is likely the best person to speak to as s/he knows you, your organizational unit and your responsibilities. You can also turn to **Human Resources, the Compliance Team, or the Legal Department**.

However, there may be times when you don't feel comfortable going through any of these channels or wish to remain **anonymous**. For those instances, intive provides a **whistleblower service** – [intive speak up](#). It offers a **confidential** and **autonomous alternative for reporting serious misconduct**.

WE DON'T TOLERATE RETALIATION

A culture of openness means protecting the rights of those who report issues in good faith. Any retaliation action against an individual for reporting in good faith a violation will not be tolerated and is in itself treated as a violation of our Code and should be reported accordingly.

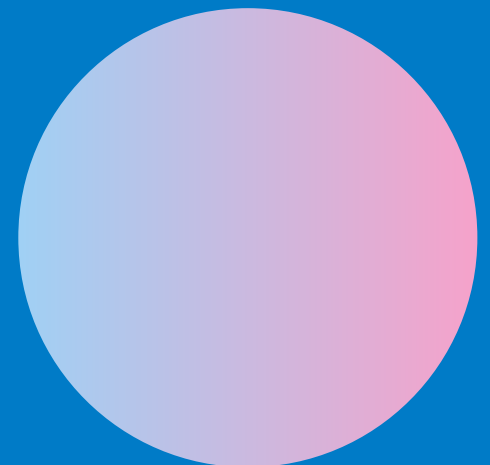
A photograph of four diverse young adults (three women and one man) smiling and laughing together against a solid pink background. The man is in the center, wearing a brown turtleneck and a light-colored jacket. To his left is a woman with long brown hair and blue eye makeup, wearing a black top. To his right is a woman with curly dark hair, wearing a plaid skirt and a watch. On the far right is a woman with short dark hair, wearing a white t-shirt with a rainbow graphic and blue jeans. A large blue rectangular box is overlaid on the left side of the image, containing the text "We respect each other" in white.

**We respect
each other**



intive

It's not like we get life-changing lessons every day. What's sure though, is that we're the sum of our everyday actions. We spend together a lot of time and aim to make the most of it.



Non-discrimination and preventing harassment

We always protect **diversity** and provide **equal opportunities** at our workplace. At intive, we're all treated equally with regards to entering and terminating an employment relationship, the terms and conditions of employment, promotion opportunities, rewards and benefits, and access to professional training. In every aspect of our company life, **our individual professional qualifications are the only basis for the evaluation of our performance**. We're all responsible for contributing to an inclusive and non-discriminatory working environment for our colleagues.

We commit to better recognizing the diversity of society inside and outside the company and to continue driving diversity-oriented campaigns and activities across the organization.

We do not tolerate discrimination based on racial or ethnic origin, nationality, pregnancy status, sex, gender identity or expression, sex life or sexual orientation, age, mental or physical disability, medical condition, marital status, veteran status, political opinions, personal interests, religious or philosophical beliefs, trade union membership, employment conditions or any

other characteristics.

Though discrimination, bullying or harassment may have different forms, all intivers are required to speak up and take appropriate action whenever they experience or suspect misconduct. To increase the awareness and vigilance, all new joiners need to complete a compliance induction training that explains non-discrimination, and anti-harassment policy and principles.

All managers should serve as positive role models in this respect and make sure that they create and promote a working culture free from unjust or prejudicial treatment and harassment. This means, that all intivers can always ask for their assistance in case they learn, witness or experience any form of discrimination, harassment or bullying.

More details about preventing discrimination in intive's locations can be found on our intranet.

RESPECT IS NOT JUST A WORD

Any conduct that can be considered as mobbing, harassment, intimidation or bias is not welcome at intive. That's why you should avoid things such as (but not limited to):

OFFENSIVE LANGUAGE

INAPPROPRIATE JOKES

RACIAL OR GENDER SLURS

DEGRADING COMMENTS

DISPLAY OF SEXUALLY SUGGESTIVE PICTURES OR PORNOGRAPHY

YOU SHOULD ALSO REACT WHEN WITNESSING SUCH BEHAVIOR

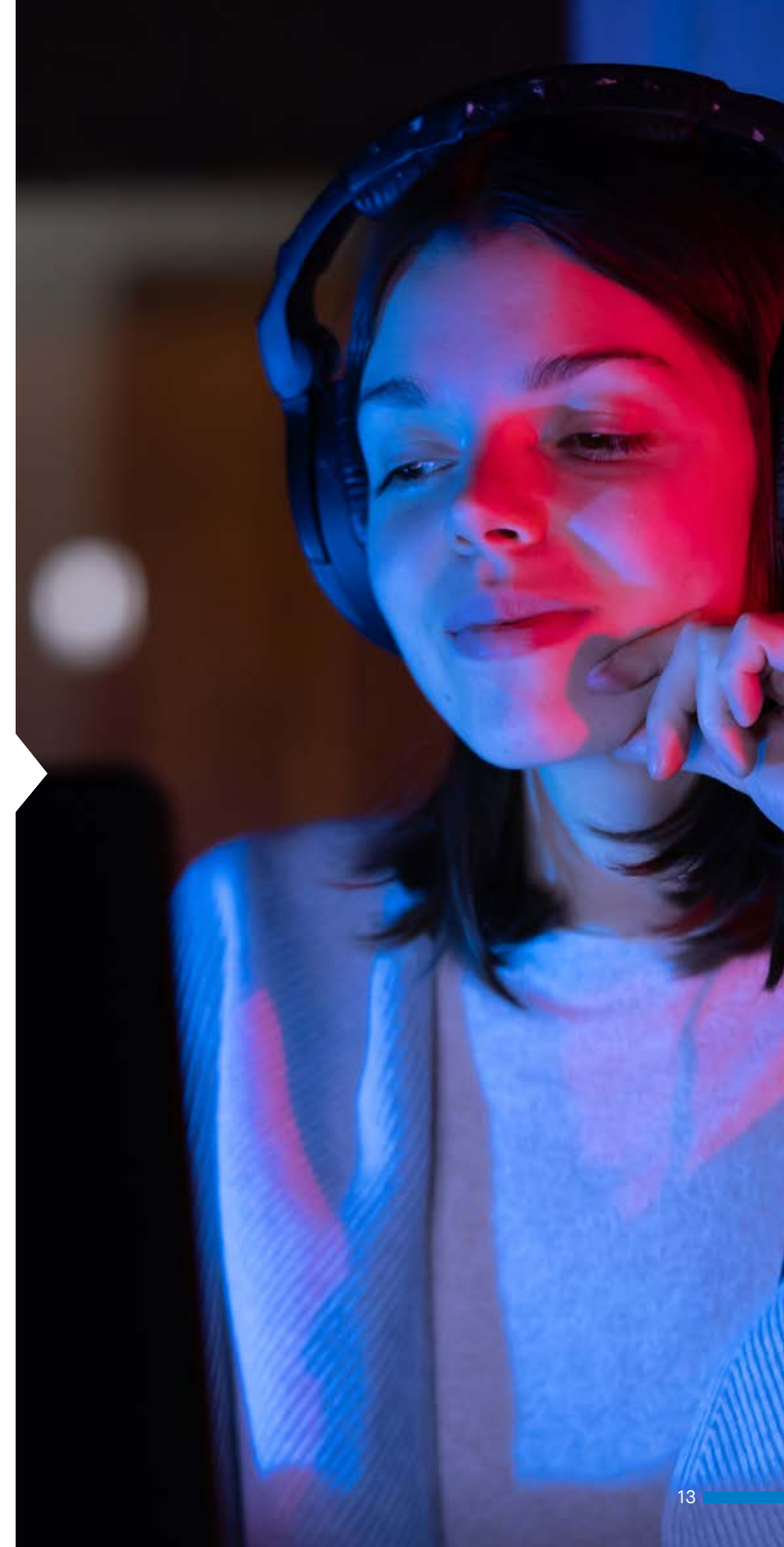
Fair Labor Practices

Compensation and Working Hours

We comply with all applicable laws regarding working hours, overtime, wages and benefits. We do that not only because it is our legal responsibility, but also because we find it crucial for intivers' well-being. Hence, deductions from wages as a disciplinary measure shall not be allowed, if not legally permitted. We never demand from intivers to work more than it is allowed by the national law. Overtime is requested in specific circumstances only. We pay intivers a fair compensation for all the overtime work they provided.

Freedom of Association

As we value our employees and their labor rights, we also respect their freedom to join, leave or refrain from joining any workers organizations, unions, and other employee representation of their choice, without facing threat or intimidation. We recognize their right to collectively negotiate in accordance with applicable laws. They are independent bodies, that represent employees' rights and participate in employees related decisions.



Conflict of interest

A conflict of interest can happen when what we do outside the workplace overlaps with our work inside the workplace. As intivers, we should avoid conflict, or the appearance of conflict, between our personal interests – or those of our family members or friends – and our company's interests. Some areas may be particularly exposed to conflicts of interest.

Think about:

recruitment (being a hiring manager or a supervisor when hiring somebody you know),

contracts outside of intive (advisory roles, board memberships, etc.), especially with our competitors,

supply (using intive suppliers for personal benefit),

gifts and entertainment (giving or accepting gifts, entertainment and other benefits that create a sense of obligation).

RESPECT IS NOT JUST A WORD

When considering a particular action, think whether it creates a situation in which your ability to make business decisions related to intive is compromised by your personal relationships or financial interests outside the company. If the answer is 'yes', you probably face a conflict of interest and you shouldn't proceed.

Most conflicts of interest can be avoided or managed successfully. For example, a romantic relationship between a manager and a subordinate causes a conflict of interest that can be handled by adjusting the work arrangements of either or both individuals involved. It's always better to be open about your concerns than to do nothing and accept a situation which is not tolerated by intive and other co-workers.

Employee health and safety

Ensuring our health and safety is one of the basic obligations of an employer. We follow all the **health and safety regulations** but also promote **healthy lifestyles** and support activities that enhance employees' health, well-being and **work-life balance**.

We do not engage in hazardous activities that could put our or other individuals' health at risk. We also have **zero-tolerance towards any kind of violence** or hostility, including verbal attacks, threats, intimidation or weapon possession on intive's premises.



RESPECT IS NOT JUST A WORD

Working under the influence of illegal drugs, controlled substances used for non-medical purposes or alcoholic beverages, may create an unacceptable safety risk. Alcohol consumption on office premises is subject to national and local law regulations. If alcohol consumption in your office is prohibited, it will not be tolerated, and if it's permitted, you should always use good judgment and avoid alcohol abuse.

Also, selling, distributing, transferring or possessing illegal drugs or controlled substances while working on the premises, except for approved medical purposes, is not allowed.

If a Line Manager suspects that you're under the influence of substances that can affect your performance or the safety of others in the workplace, s/he may request a drug or alcohol screening, if permitted by the local law.



Fraud

We value honesty and transparency. This means that any deliberate manipulation when acting on behalf of intive won't be tolerated. Fraud is defined as **intentional deception, avoiding an obligation, embezzlement/misappropriation of resources, forgery, extortion, theft, conspiracy, collusion or deliberate manipulation including intentional concealment or the omission of material facts**. Fraud is committed by one or more individuals to obtain an unjust or illegal advantage personally and/or for family or friends.

We strive to build an **anti-fraud culture** in our organization by adopting a global policy and launching a training.

EXAMPLES OF FRAUD INCLUDE:

FALSIFIED OVERTIME TO EARN MORE

PRESENTING FALSE MEDICAL INFORMATION TO OBTAIN BENEFITS

UNRECORDED VACATION OR SICK LEAVE

STEALING CASH OR EQUIVALENT (EQUIPMENT/SUPPLIES)

USING CORPORATE CREDIT CARDS FOR UNAUTHORIZED PURCHASES

ENTERTAINMENT WITHOUT A LEGITIMATE BUSINESS PURPOSE

MISSTATING FINANCIAL INFORMATION IN THE COMPANY'S BOOKS AND RECORDS

The image features a close-up of two hands shaking in a firm, confident grip. The hands are positioned diagonally across the frame, with one hand from the top left and the other from the bottom right. The skin tones are natural, and the lighting is soft, highlighting the texture of the skin and the strength of the handshake. A solid blue rectangular box is overlaid on the center of the image, containing the text "We respect our business partners" in white, bold, sans-serif font.

**We respect our
business partners**

Handling personal data

As a company operating in the IT industry, we strive to provide our customers with maximum security regarding the personal data they entrust us with. We adhere to all applicable laws and we've defined strict internal policies which guide us in handling personal data. To make it easier for all intivers to act in line with the privacy laws and internal policies, a set of these documents is always available on our intranet sites.

Security of services:

We've implemented appropriate technical and organizational measures, which are always subject to individual arrangements with the customer. If our customer doesn't impose on us any specific requirements, we always meet the industry-recognized standards. Our own infrastructure ensures secure deployment of services, safe data storage, communication, etc.

Authorizations:

Our internal regulations strictly limit access to and use of customer data as well as require that each of us takes measures to protect it from unauthorized access. We all complete mandatory trainings on data protection and security to understand our responsibilities and procedures. We collect, use and access customer's personal data only as authorized by privacy and security guidelines, and also applicable data protection laws.

Incident management:

We have an incident management process in place to be able to immediately respond to potentially dangerous occurrences and keep our customers fully informed of any security breaches related to their projects.

Data processing agreements:

We have designed a Data Processing Agreement template, which contains adequate provisions for personal data we process. It balances the risk and responsibilities between the data controller and data processor in accordance with the law. The agreement is applied whenever it's needed.

Confidential information

Confidential information at intive is any technical, commercial and/or other information on businesses, products, prices, programming techniques, customers, prospects, vendors, processes and/or future plans.

We safeguard the **business value of information** whether it's ours or belongs to another organization, which means that we disclose it only when we are authorized to do so.

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ror_mod.use_y = False
ror_mod.use_z = False
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ror_mod.use_y = True
ror_mod.use_z = False
peration == "MIRROR_Z":
ror_mod.use_x = False
ror_mod.use_y = False
ror_mod.use_z = True

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ob.select= 1
c_ob.select=1
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RESPECT IS NOT JUST A WORD

Sharing confidential information with someone by e-mail requires extra cautiousness. If you need to do that, always check the recipients.

Documents containing confidential information should not be left on your desk or in any other place without supervision, where other people can have access to them. Consistent with that, you should also pay attention to data displayed on your screen when being in the company of others, e.g. when you're travelling or giving a presentation.

In public places, avoid any discussions on confidential information (including on the phone).

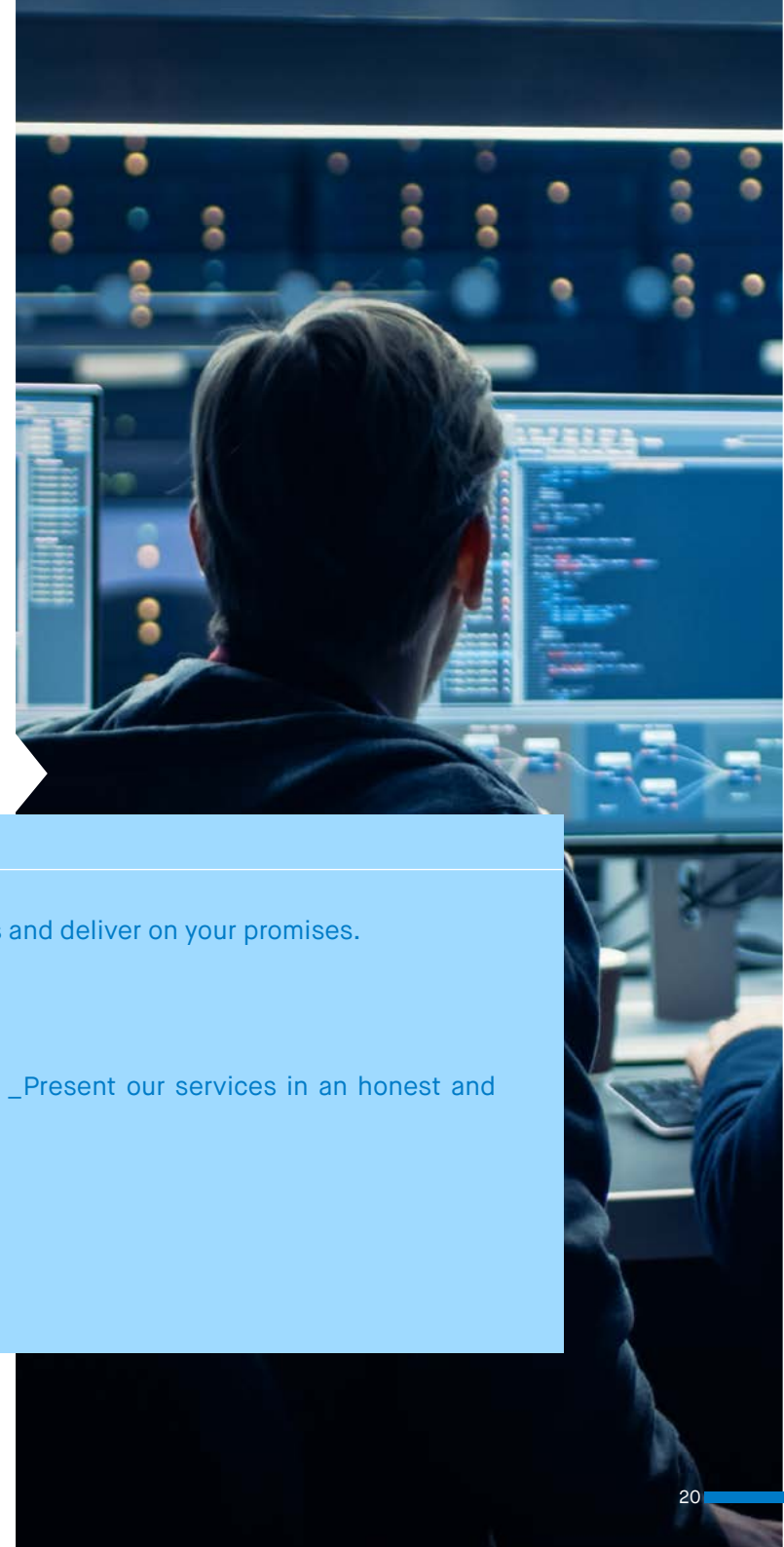
Use your best judgment while using social media. Make sure your outside communication via social media doesn't disclose confidential information and remember that only designated employees can speak on behalf of intive (e.g. when external communication is part of their duties).

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Ensuring the quality of provided solutions

Empathy is one of our three core values. We listen carefully to our customers and value a **partnership approach** based on trust. Our philosophy in business helps us meet the most demanding requirements of today's highly specialized industries.

We provide our clients with leading-edge solutions and services. Agile development methodology, Quality Assurance procedures and strict SLA agreements guard our competitive standards.



RESPECT IS NOT JUST A WORD

Interact with your customers and listen to their needs in order to identify the best possible solutions and deliver on your promises.

Always keep your customers updated.

Ensure that any information you share is correct, complete and communicated in plain language. _Present our services in an honest and straightforward manner.

Respond to all legitimate questions and requests in a timely manner.

Always evaluate the risk that may be caused by new technologies

Continuous improvement

We're always curious and hungry for more. **Enthusiasm** is encoded in our conduct as intivers and we take pride in never settling. We get creative, mixing technologies, combining techniques and challenging assumptions.

How do we get better at what we do?

Feedback is key – giving feedback is our habit and an important part of our intive culture.

RESPECT IS NOT JUST A WORD

Your workplace is a place to learn new things. Take advantage of intive's internal and external training possibilities. Ask your Line Manager for the best development opportunities and follow our internal communication.

Keep yourself up-to-date in terms of regulations applicable to your professional role.

Give feedback on a daily basis, both strengthening (focusing on the positive aspects) and developmental (enabling change and growth), regardless of your position in the organization.

Suppliers

In our business operations, we look for suppliers that are as committed as we are to achieve their goals in an **ethical way**. We pay great attention to the selection process of our suppliers and carefully consider vendor background and qualifications. Not only business criteria matter, but also fair labor practices, reputation and legal compliance represented by the potential supplier.

We implemented and follow a sanction screening process, modern slavery policy, anti-bribery and corruption guidelines, as well as other controls. If a particular supplier is entrusted with personal data, or their employees may have access to our premises or systems, additional requirements may be imposed, including audits that can be conducted by intive or a designated external body.

Our key suppliers are also asked to follow **intive's Supplier Code of Conduct**.





**We respect
the law**

intive

As a global business, our responsibility is to comply with international, national and municipal regulations, wherever we're located. Laws change – we need to stay on top of these changes.

Legal Compliance

Each intiver should know and respect the legal obligations that apply to their role in the company and is expected to comply with applicable legal requirements, internal regulations and prohibitions. All internal guidelines applicable to intivers can be found on our intranet.

If you have any concerns or questions about legal obligations that apply to your role, the Compliance Team and Legal Department are here for you with necessary guidance and assistance.

Anti-slavery statement

intive is committed to fully comply with all obligations regarding counteracting modern slavery, including one of the toughest legislations in the world – the UK Modern Slavery Act 2015 ('MSA').

We have **zero-tolerance towards modern slavery**, and we strictly prohibit it in all operations, the supply chain and in any form, including aiding, abetting, counseling or procuring an offence under the MSA. In order to prevent modern slavery in every aspect of intive's activity, appropriate controls are engaged, according to the internal policy. Everyone working for – or cooperating with – intive is responsible for preventing modern slavery, which means avoiding any activities that might enable modern slavery.

We do not accept child labor and forced labor practices and expect our suppliers and contractors to strictly adhere to this standard.

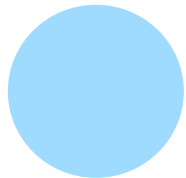
We publish our modern slavery statement according to legal provisions every year.

Anti-bribery and corruption

We have **zero tolerance towards acts of bribery and corruption** and we prohibit them in any form.

We don't make and don't tolerate any kind of facilitation payments.

We've implemented an **Anti-bribery and corruption policy** which provides clear guidance and encompasses numerous reporting and monitoring controls.



RESPECT IS NOT JUST A WORD

Drawing the line between hospitality and bribery or corruption may be difficult and can differ from one jurisdiction to another. This is why the limits set for gifts and entertainment provided in our internal policy should always be respected. Make sure you take part in mandatory training for all intivers.

Competition laws

Fair competition laws are introduced to promote dynamic market competition by regulating anti-competitive conduct by companies. They address areas such as illegal agreements between competitors that restrict free trading and competition, abusive behavior by a company dominating a market, exclusivity arrangements or pricing.

We want to outperform our competitors fairly and never engage in any activities that violate laws that protect fair competition.

RESPECT IS NOT JUST A WORD

The intellectual property rights of our competitors and other third parties require special attention. Be careful when using third-party software, including commercial and open source software.

Only gather and use competitors' information that is known to be legitimate and obtained from publicly available sources (media reports, financial reports, official publications, speeches by company representatives, etc.).

Do not discuss with competitors the price of our services or other confidential information. _Avoid making comments on competitors' products or services in an inappropriate or dishonest way.



**We respect our
assets**



intive

We wouldn't get to where we are without gifted people and their readiness to learn. intivers are the company's most precious asset. Expertise and intellectual property must always be protected – they're part of our competitive edge and are subject to confidentiality agreements with our clients.

Development and well being

We aim to be a company in which people **enjoy** what they do, one that brings them **professional fulfillment** and satisfaction in everyday life. We want to build a work environment where all our people have a chance to develop their skills and sharpen their minds.

With **Agility** as one of our core values, we believe in continuous growth and learning that can transform each individual and the whole organization. Individual learning advances organizational learning, so we invest in training opportunities, work on internal communication and encourage internal mobility.

We offer **clear and documented career paths**. Career management is held by direct managers who regularly meet with employees to set development goals and discuss professional future. Those meetings are a space for **feedback** from both sides and an opportunity to discuss work, projects, teams, challenges, company and anything that appears to be important to the employee or the manager.

We run our recruitment processes based on good practices developed over our long company history. We provide detailed feedback to candidates whom we cannot offer employment opportunities. We also conduct **exit interviews** that help us learn by our mistakes.

We want all intivers to feel part of the company and be aware of the fact, that each one of us contributes to our community as a whole. We carry out **satisfaction surveys** among all the staff to know their opinion. Whenever possible, we try to make decisions in a democratic way, taking into account intivers wishes.

We don't look the other way when intivers are struggling with life difficulties. They can always reach out to their managers, HR department or the Compliance Team to get assistance. We also provide extra support such as e.g., the 'Less Stress! Program' that consists of webinars and trainings aiming to tackle stress and strong emotions.



Assets' protection

intive's assets include physical assets and intangible assets, such as confidential information, intellectual property and information systems. intive provides us with all the necessary assets and we're **personally responsible for protecting them**. This means that every intiver should avoid situations that could lead to loss, misuse, theft, or unauthorized disclosure of entrusted assets.

RESPECT IS NOT JUST A WORD

Common sense is crucial. Use company resources only for legitimate business purposes. However, incidental, personal use of a company phone, email and the internet is not the end of the world. Naturally, it should never interfere with your professional duties or include actions which are illegal, inappropriate or not compliant with the Code or security rules.

intive has the right to monitor your email, phone and internet activity as well as activity on other systems, to the extent permitted by the local law



Accurate books and records

Responsibility to our shareholders requires **making the best use of company funds, assets and information**. We all need to make sure that company money is spent in an appropriate manner. Managers are responsible for all the money spent by their organizational units and should carefully consider all expenses before approving.

Accuracy, transparency and **completeness** of company books and records are vital. Inaccurate financial reporting could result in serious consequences for intive, including financial penalties and a reputational crisis. Our financial statements and regulatory reports need to comply with all applicable accounting principles and fairly represent company condition and results.

To ensure compliance with accounting, tax, legal and other applicable requirements wherever we run our business, we have a **system of internal controls**: combined policies, authorization procedures and processes executed by adequate functions.

Professional, compliant and **transparent** management structures provide clear decision- making paths and define responsibilities. Our organizational structure and any changes to it are being communicated to all intivers through internal communication channels.



Intellectual property

Intellectual property refers to **ideas** and **information**. intive's intellectual property rights include logo, trademark, know-how, patents, software and source code, among others. The products of your work are part of the intellectual property we protect and value. Any work you create as an intiver, in connection with your official duties and using company time, resources or data, belongs to intive.

RESPECT IS NOT JUST A WORD

Use the company name and brand images thoughtfully, in good faith and as authorized by the Marketing Department. The same applies to the use of the intive logo for any business or commercial venture.



Information security 1.1

intive is fully committed to continuously safeguarding confidentiality, integrity and availability of company assets which guarantee the security of the data we manage.

To this end, we implement security measures and regulations based on internationally recognized data security standards and information security best practices.

We've implemented the **Security Incident Management** system, mandatory competency training and periodic system penetration tests to ensure every intiver remains vigilant and fully aware of the cyber threats of the modern word.

You must remain compliant with information security regulations at all times.

If you believe you've identified any security incident, breach, weakness or vulnerability which raises your concern, or you lose any data from your laptop or mobile device, including theft of the device itself, please get in touch with the Information Security Team at the earliest.



A photograph of a wind farm at sunset. The sky is a mix of purple, pink, and orange. In the foreground, a large wind turbine is silhouetted against the sky. In the background, a long line of smaller wind turbines stretches into the distance.

**We respect the
environment**

At intive, we hold dear a ‘think twice’ approach. We carefully consider each travel cost and track our carbon footprint. We also build and run our offices with sustainability in mind.

Environment

We recognize that our operations have an impact on the environment and we are committed to respecting it and seeking to minimize the harmful effects of our activities as far as reasonably practicable.

We also comply with all environmental laws, regulations and standards applicable to our business in the countries we operate in.

Travel and transport management

We are aware that the majority of carbon dioxide we generate comes from our travel and logistics. We try to minimize business travel and optimize our processes by reducing the number of journeys. We encourage intivers to avoid any unnecessary travel and promote switching to videoconference tools. If business travel is required, we choose adequate means of transportation that help both our business goals and the environment. We introduced remote work and hybrid office model which highly contribute to the reduction of CO² emissions.

Gas emissions

We seek to minimize our greenhouse gas emission, including carbon dioxide, that results directly or indirectly from our activities. We offset our carbon footprint generated by business travel to compensate for CO² emissions.

Waste management

We measure our waste, including water and energy, and seek to minimize its generation. We ensure proper management of generated waste, including cooperation with authorized waste collection services. Where applicable, we recycle, reuse, or substitute materials to reduce the impact of waste on the environment.

RESPECT IS NOT JUST A WORD

If possible, choose a videoconference over a trip. If travel is necessary, please go for the option that best combines time, business, and environmental goals.

If you commute to the office, choose a bicycle, public transportation or carsharing, whenever possible.

Your individual choices matter. You contribute to positive change by using resources responsibly. Reduce waste production and consumption of energy, water, and materials.

Join our green initiatives that help us preserve the environment.

A few closing thoughts

This Code of Conduct doesn't include all the legal and ethical obligations that apply to our work. It provides an **overview** of the most important ones and a source of **best practices**. You'll find all global and local procedures applicable to your function on our company intranet sites. Make sure you're up-to-date with all obligatory training and when in doubt, **contact your line manager**.

Making the right decisions is not always easy. We all make mistakes and, frankly speaking, that's how we learn. What's important is to **never hesitate to ask or raise concerns**. If you have any questions or doubts regarding the implementation of this document, please contact your Line Manager, Human Resources, the Compliance Team or Legal Department.

Sometimes, it makes all the difference.

Diego Rubio Robert Price

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