

CODE OF ETHICS

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1. OBJECTIVE

The purpose of this Code is to reflect the corporate values and basic principles to which all actions by employees of the companies and other entities comprising the Group must adhere, namely **HEALTH TRANSPORTATION GROUP**.

From now on and for the purposes of this Code, we will refer to Health Transportation Group as “HTG” or “The Group” thus encompassing all the companies and other subsidiaries of the so-called *Grupo Ambuiberica* and *Grupo Emeru*, from whose merger HTG has resulted, on the understanding that such dependence exists, when management control is exercised over them.

2. SCOPE OF APPLICATION

According to the founding objective of this Code, it shall apply to

- All the companies and entities comprising the Group, regardless of their business area, geographical location or activities.
- The members of the administrative and management bodies of the Group companies.
- The employees of any of the companies that constitute the Group.

3. MAIN PRINCIPLES OF OPERATION

3.1. Respect for the Law

The Group will carry out its activities under strict compliance with the laws in force in all the countries in which the Group operates.

Therefore, all the Group's employees will be subject to and will ensure compliance with the laws and regulations currently in force in the place where they carry out their activity. In this regard, the Group assumes special importance, to control and monitor all those actions that may involve the commission of a crime of corruption in business, money laundering, price alteration in public tenders and auctions or illegal financing of political parties, and therefore will allocate specific resources to prevent its commission.

Likewise, they will respect the commitments and obligations assumed by the Group in its contractual relations with third parties.

3.2. Respect for human rights

All actions of the Group and its employees shall scrupulously respect the Human Rights and Public Freedoms included in the Universal Declaration of Human Rights.

3.3. Integrity

The activities of the Group and its employees will be based on the values of integrity and honesty, avoiding any form of corruption and respecting the particular circumstances and needs of all those involved.

3.4. Social Commitment

The Group is committed to acting in a socially responsible manner, respecting the habits, customs and principles in force in the countries in which it operates.

3.5. Environment

The Group has established an Environmental Policy, which defines as basic criteria the integration of the environment into the business, the development of environmental management actions and the promotion of environmental responsibility.

All personnel must know and accept the Group's Environmental Policy and strive to minimise the environmental impact of their activities.

The Group must communicate these principles in its relations with suppliers and collaborators and demand compliance with the environmental procedures and requirements applicable in each case.

4. SPECIFIC PRIORITIES IN RELATION TO EMPLOYEES

4.1. Equal opportunities and non-discrimination. Professional development

All employees shall enjoy equal opportunities for career development regardless of age, sex, marital status, race, beliefs, disability or any other personal, physical or social condition.

To guarantee this principle, the Group will constantly review its equal opportunities policies so that employees can carry out their professional activity on the basis of the principle of merit.

As a result, all employees will be subject to objective selection and promotion criteria, based on their personal performance, worth and professional experience.

4.2. Respectful work environment and free from harassment

The Group rejects any manifestation of harassment, abuse of authority, as well as any other conduct that could generate an intimidating, offensive or hostile working environment, for which it will take the necessary measures to ensure a pleasant and safe working environment.

4.3. Promoting the reconciliation of work and personal life

The Group is committed to working actively to implement measures aimed at achieving a balance between the professional and family and/or personal responsibilities of its employees, who, in turn, must make it easier for the reconciliation measures established by the Group to materialise.

4.4. Occupational Risk Prevention

The Group has established an Occupational Risk Prevention Policy, the aim of which is to achieve working environments in which the right of employees to protection of their safety and health is safeguarded.

4.5. Training

The Group is committed to improving the technical training of its employees, for which it will design training plans that make it possible to increase their knowledge, which will have repercussions on the possibility of increasing their skills, facilitating their professional development.

4.6. Respect for privacy and confidentiality of employees information

The Group will only collect and process the personal data of employees that are strictly necessary in relation to the scope and purposes for which they have been obtained.

Accordingly, the Group shall take all the necessary measures to preserve the confidentiality of the personal data at its disposal and to guarantee the confidentiality of the transmission of such data, in full compliance with the applicable legislation in force.

4.7. Diligence, integrity and professionalism

Employees shall behave with diligence and professionalism, which implies developing the competencies and responsibilities attributed to them under criteria of loyalty, impartiality, honesty and confidentiality.

Under no circumstances shall Group personnel resort to unethical practices to influence the will of third parties with the aim of obtaining income, advantages or privileges for the Group, any of its companies or for themselves.

When dealing with government personnel, such conduct shall result, among other things, in an absolute prohibition (i) to offer or deliver to a public authority or official any type of cash or any other type of economic benefit as a reward, (ii) to exercise or try to exercise (directly or indirectly) influence over a certain public authority or official by taking advantage of any personal relationship they may have with that authority or official, or (iii) to engage in any conduct that could influence or alter the price that should result from the normal course of the tenders and auctions.

Furthermore, and as a general criterion, under no circumstances may any representative, manager or employee of the Group make or accept payments, gifts or any other type of gift that could lead to possible favourable treatment or compensation.

The exception to this rule would be gifts of symbolic value that fall within the usual patterns of courtesy in business relations and are not intended to improperly influence the will of individuals to obtain advantages.

This prohibition will be especially monitored with regard to all forms of bribery, so that no benefits may be offered for the benefit of third parties who are in the service of any

organisation (public or private) to obtain advantages or conduct business, whatever their nature.

Consequently, it is strictly forbidden to receive donations or make contributions, either by oneself or by a third party, to a political party, federation, coalition or group of electors in violation of the provisions of the regulations on the financing of political parties.

4.8. Conflict of interest

Employees may not participate in activities or operations, whether professional or private, that may conflict with the interests of the Group.

This means that they must refrain from representing the Group or any of its companies, intervening or influencing decision-making on matters in which, directly or indirectly, they have a personal interest.

Employees who may be involved in a conflict situation shall be compelled to report it to their hierarchical superior. This situation will be reported to the relevant body, which will authorise the activity or assume the necessary measures to overcome the conflict.

4.9. Use of allocated resources

The Group will provide its employees with suitable jobs and sufficient resources for the normal and correct performance of their professional activity.

Consequently, no employee may use the resources made available by the Group, such as telephone, computer, e-mail, Internet access or other materials for work activities not entrusted to them or for private or other uses.

4.10. Information management

Employees shall be bound to maintain absolute confidentiality with regard to personal data and information they hold on other employees and to which they have access in the course of their professional activities. This responsibility shall continue after the termination of the employment relationship.

This will mean that:

- All information relating to customers, shareholders, employees, suppliers, strategic plans, financial, commercial, statistical, legal or similar information must be considered confidential and treated as such.
- Information to which they have access by reason of their work may not be used for purposes other than those legally or contractually established.
- The processing of personal data must be carried out subject to the regulations on personal data.

5. SPECIFIC PRINCIPLES WITH THIRD PARTIES AND MARKET

5.1. Quality

The Group will seek to best meet the expectations of its customers, and will therefore provide services under the maximum possible conditions of quality and efficiency.

5.2. Transparency

The Group will base its relations on the principles of integrity, professionalism and transparency.

5.3. Impartiality

The selection and contracting of products or services from third parties must be made on the basis of objective technical, professional and economic criteria, without prior discrimination, provided that the internal rules for selection and contracting established by the Group are followed.

5.4. Confidentiality

The Group guarantees compliance with the confidentiality and privacy of any third party data stored.

Therefore, the Group has established an Information Security Policy whose objective is to preserve the confidentiality, integrity and availability of the information.

5.5. Ethical commitment

The Group will require in its relations with third parties that they prove their commitment to ethical conduct similar to those outlined in this Code.

Professionals and collaborators with whom the Group establishes contractual relations shall be informed of the existence of this Code of Ethics and must accept all its terms and, in particular, the principle of respect for legality set out in point 3.1.

6. SPECIFIC PRINCIPLES IN RELATION TO COMPETITORS

6.1. Respect

The Group operates in the market with total integrity, offering its services to both public and private entities in the full awareness that it will be able to execute them with adequate quality standards, refraining from disclosing by any means erroneous or incorrect information about other entities that carry out their activity in the same sector.

6.2. Open competition

The Group is committed to actively yet fairly compete in the marketplace, respecting the rules of free market and defence of competition established for this purpose.

Therefore, the Group will not take any initiative or participate in any offer in this respect that would violate existing legislation on the defence of competition.

This will mean, among other obligations, that prices must be established independently and must never be agreed in advance with competitors and that the provision of services by the Group will always be the result of fair competition.

All employees, but particularly those engaged in sales and purchasing activities, must be aware of applicable competition laws. If you have any questions in this regard, you should contact the Group's Legal Services Department for clarification and advice.

6.3. Collaboration

Always in accordance with the law in force, the Group may open channels of collaboration with its competitors in defence of the common interest of the sector in which they operate, as well as help and support in humanitarian actions, natural disasters or health emergencies.

7. IMPLEMENTATION CONTROL

This Code's principles and criteria of action are mandatory for the Group's representatives, managerial positions and other employees.

Employees are required to inform the Ethical Committee of any violation of this Code when they have evidence that such a violation has occurred.

The Group guarantees that there will be no retaliation for reporting a breach of this Code, or for having participated in any investigation procedure, ensuring maximum discretion, reserve and confidentiality with respect to the complainant and reported facts.

Failure to comply with this Code will be punished in accordance with the disciplinary regime in force, without prejudice to any other responsibilities that may arise from such a breach.

To ensure its implementation, an Ethical Committee will be established, which will have the following functions

- **Skills:**
 - To interpret the Code of Ethics, for which purpose it will receive, process, evaluate and resolve all communications and queries related to the application of the Code, for which it must guarantee confidential processing.
 - Provide recommendations to the Administrative Body and propose to it any modifications, clarifications and implementing rules that they consider the Code may require.
 - To prepare periodic reports on the level of compliance with the Code.
- **Composition:**
 - Higher Level Management (will lead the committee)
 - Responsible for the Human Resources area.
 - Responsible for the Legal area.
 - Responsible for the Group's regulatory compliance.
 - Responsible for any other area of the Group, which will be renewed annually.
- **Frequency of meetings:**

The Ethical Committee will meet at least once a year to discuss the content, evolution and possible improvements of the aspects covered by this Code.
- **Operating procedure:**
 - Consultations and complaints may be made by any of the following means
 - Mailbox of the Group's web page designed specifically for this purpose.
 - E-mail: cumplimiento.normativo@htgroup.es
 - Inquiries and complaints must have the following minimum content:
 - Identification of the complainant.
 - Statement of facts, indicating the signs observed and, if possible, providing evidence to support its statement.
 - Presumed responsible for the non-compliance or at least their position or area to which they belong.
 - In the event of queries, indication of the section in respect of which clarification is sought, stating the reason why such an explanation is required.
 - The Ethical Committee will analyse the information and take the measures deemed appropriate for the resolution of the facts.
 - Once the investigation has been completed, the Ethical Committee will issue a resolution that will be enforceable on the employees concerned.
 - In accordance with the pronouncement contained in the resolution, it will be transferred to the Group's Human Resources Directorate so that it may apply the appropriate disciplinary measures.

8. APPROVAL AND VALIDITY

This Code was approved by the Group's Chief Executive Officer of HTG Group on 30th January 2019.

The Executive Board shall be responsible for reviewing and updating its content regularly and as it deems appropriate.

Group's Chief Executive Officer of HTG Group

HEALTH TRANSPORTATION GROUP, S.L.
NIF B-87973145 

Signed: Gonzaga Higuero Robles

Version history:

Version	Approval's date	Purpose	Modification	Changes:	
				Conducted by:	Authorised by:
0.1	January 19	Original text	Not applicable	Legal Services Directorate	Group's Chief Executive Officer of HTG Group