Compliance Policy

METRICA is a Spanish company specialized in information technologies. It offers creative solutions to business challenges and expert knowledge to help clients stay current with the latest innovations in information and communication technologies, as well as to apply those technologies to benefit their businesses.

The company develops customized projects for each client, integrating them into their respective Management Systems. It assumes full or partial responsibility for the evolution and/or management of Information Systems, providing professionals with varying levels of specialization and experience—capable of creating new IT solutions, supporting management, ensuring operational continuity, and promoting the technological evolution of both new and existing platforms. It is a team with broad experience, having completed projects in companies across various sectors, sizes, and complexities.

The management of METRICA has decided to implement a Compliance Management System, based on the UNE-ISO 37301:2021 standard, that is both independent and sufficiently empowered. Its objective is to ensure that work is carried out in accordance with the procedures of the system, and to assure clients and the broader public that METRICA complies with applicable legislation as well as the requirements defined in the Compliance Management System itself.

Accordingly, this system is aligned with the company's ethical values, reinforcing METRICA's commitment to conducting business in accordance with legal and internal standards, and formally establishing its principles in compliance matters.

This Policy reflects a culture of integrity and respect for the rules, considering not only the organization's own interests but also those of its stakeholders.

In this regard, the Policy is aligned with METRICA's strategic objectives and affirms its commitment to zero tolerance for any conduct that may constitute a criminal offense. For this reason, the full commitment of management and all members of METRICA is required.

PRINCIPLES

Outlined below are the main responsibilities of the Compliance Body:

- Independently drive and supervise the implementation of the Compliance Management System, ensuring that all subjects covered by this document have access to METRICA's compliance regulations.
- Identify compliance obligations, maintain them up to date, and communicate them to all members of the organization.

- Identify and manage compliance risks by analyzing and assessing them in order to prioritize actions and allocate resources effectively for their prevention, detection, and management.
- Promote the use of METRICA's whistleblower channels and ensure that no retaliation occurs against those who report concerns.
- Conduct awareness and training programs so that all individuals covered by this document acquire the necessary knowledge and skills to fulfill their compliance responsibilities.
- Promote and ensure the implementation of compliance training programs, guaranteeing the dissemination and enforcement of METRICA's Code of Ethics and Conduct, along with related policies and procedures.
- Provide guidance to METRICA's management and to any other member of the organization who requires assistance from the Compliance Committee. Also, produce reports for the Governing Body and senior management based on the results of the system's performance and assessments.
- Appropriately identify and document the core elements of the Compliance Management System and any related records. Ensure such information is available (unless confidentiality restrictions apply), suitable for use, traceable, and preserved for legibility—fostering a culture of responsibility and adherence to the company's core values among all METRICA professionals.
- Measure the performance of the Compliance Management System using indicators, ensuring its correct operation and encouraging continuous review and improvement.

OBLIGATIONS

As legal compliance and proper functioning of the Compliance Management System concern everyone at METRICA, all individuals—regardless of their role—are expected to comply with the provisions of this document, act ethically, and refrain from any criminal conduct in all circumstances. They must also promptly follow the directions issued by the Compliance Body as part of its responsibilities.

All members of the organization are responsible for understanding, following, and applying this Compliance Policy, cooperating with the Compliance Body, Governing Body, and senior management whenever necessary. This includes especially adhering to the expectations set out in METRICA's Code of Ethics and Conduct.

Likewise, everyone is expected to immediately report to the Compliance Body any action intended to prevent or address a potential criminal offense or violation, particularly if being handled without proper compliance oversight.

In addition, all members of the organization are expected to support this Compliance Policy, participate in relevant training sessions based on their roles, and provide requested information and documentation to the Compliance Body without delay.

AWARENESS AND COMPLIANCE STATEMENS

This Policy is available to all members of the organization via the corporate intranet.

For those in positions especially exposed to criminal risk, an annual compliance declaration will be requested to confirm adherence to this Compliance Policy.

CONSEQUENCES OF NON-COMPLIANCE

As outlined in the Code of Ethics and this Compliance Policy, all individuals covered by this document—regardless of their hierarchical level or geographic/functional location—are required to comply with the principles and procedures described, insofar as they apply.

To ensure the effective operation of the Compliance Management System, everyone is encouraged to report any violations through the Whistleblower Channel.

To support this enforcement, METRICA has established a Compliance Disciplinary System, which serves as the internal mechanism to demonstrate the effective implementation of the Compliance Management System. It provides the framework to discipline violations, under applicable labor laws or other relevant legal frameworks, including breaches of:

- METRICA's Code of Ethics and Conduct
- Internal policies and procedures
- Applicable laws and regulations
- Market best practices

The disciplinary measures taken will always respect applicable legal standards, while being firm and proportional to the seriousness of the facts. When appropriate, legal representatives of employees will be informed.

If it is determined that the actions of any member of the organization may be considered a criminal offense attributable to the legal entity, this will be reported to the competent public authorities for their knowledge and potential investigation. Such communication will be supported with any evidence or indications gathered.

Signed: METRICA Management



Signed: Compliance Officer

