

CODE OF ETHICS, CONDUCT AND ANTI-CORRUPTION

QUASAR SCIENCE RESOURCES, S.L.

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1. Purpose

This Code of Ethics, Conduct and Anti-Corruption establishes the principles, values and rules of behaviour that must guide the actions of Quasar Science Resources, S.L. in the performance of its professional, commercial, technical, scientific and institutional activities.

This Code defines the expected conduct framework for all persons who are part of Quasar or collaborate with it, and aims to:

- Promote a culture based on ethics, integrity, transparency and regulatory compliance.
- Strengthen the trust of customers, public administrations, universities, research centres, suppliers, collaborators, partners and other interested parties.
- Prevent conduct contrary to the law, professional ethics, information security, people's rights, the environment or Quasar's legitimate interests.
- Establish clear criteria regarding anti-corruption, conflicts of interest, gifts, invitations, sponsorships, confidentiality, equality, diversity, respect, sustainability and corporate responsibility.
- Facilitate the reporting of concerns, irregularities or breaches through Quasar's Whistleblowing Channel.
- Strengthen Quasar's commitment to responsible business conduct, aligned with the expectations of its customers, public bodies, scientific institutions and partners.

This document is integrated into Quasar's Information Security Management System and complements the policies, procedures, instructions and internal protocols in force.

2. Scope

This Code applies to:

- All Quasar employees, regardless of their contractual arrangement, position, seniority, workplace or working model.
- Top Management, area managers and persons with management, supervision or coordination responsibilities.
- Collaborators, interns, trainees, scholarship holders, external professionals and any person providing services to Quasar.
- Suppliers, subcontractors, technology partners, consultants, advisers and third parties acting on behalf of Quasar or participating in activities, projects or services linked to the organisation.
- Any third party maintaining a professional, commercial or institutional relationship with Quasar, to the extent applicable.

Quasar shall promote awareness of and respect for the essential principles of this Code among its suppliers, collaborators and partners, especially when they have access to Quasar's information, customer information, project information, systems or critical activities.

3. Quasar's principles and values

Quasar's activity is based on the following corporate values:

3.1. Honesty and integrity

Quasar acts with transparency, ethics and responsibility in all its professional relationships, avoiding any conduct that could compromise the trust of customers, institutions, suppliers, employees or third parties.

3.2. Quality and innovation

Quasar seeks technical excellence and promotes innovative solutions in its projects, maintaining standards of professional rigour, reliability, security, continuous improvement and results orientation.

3.3. Customer commitment

Quasar works to build long-term relationships based on trust, professionalism, fulfilment of commitments and appropriate protection of information processed in the framework of the services provided.

3.4. Collaboration and respect

Quasar fosters teamwork, interdisciplinary collaboration, respect among people and diversity of knowledge, experience and perspectives.

3.5. Professional responsibility

Quasar complies with its legal, contractual, regulatory, information security, data protection, quality and risk prevention obligations, applying a responsible and risk-based approach.

3.6. Corporate responsibility

Quasar promotes responsible business activity, considering the impact of its decisions on people, society, the environment, the supply chain, its customers and other interested parties.

4. Top Management commitment

Quasar's Top Management undertakes to:

- Promote a culture of ethics and compliance.
- Ensure that this Code is communicated, known and accessible.
- Provide reasonable means for its implementation.
- Act as an example in complying with its principles.
- Prevent, detect and correct conduct contrary to the law, this Code or internal policies.
- Protect persons who report possible irregularities in good faith.
- Foster a culture of open and responsible communication, free from retaliation.
- Review and update this Code whenever necessary.

Top Management is responsible for approving this Code and any substantial amendment to it.

5. Expected professional conduct

All persons within the scope of this Code must act in accordance with the following principles:

- Comply with applicable legislation, contractual commitments and Quasar's internal policies.
- Act with professionalism, good faith, honesty, diligence and respect.
- Avoid any action that may harm Quasar's reputation, legitimate interests or security.
- Use corporate resources responsibly and only for authorised professional purposes.
- Protect the information of Quasar, its customers, suppliers, partners and third parties.
- Report any breach, risk, incident or irregular conduct of which they become aware.
- Cooperate in internal investigations when required, maintaining confidentiality.
- Avoid behaviours that may constitute abuse of authority, discrimination, harassment, degrading treatment, retaliation or conflict of interest.
- Make professional decisions based on objective, transparent and verifiable criteria.

6. Legal, regulatory and contractual compliance

Quasar operates in a technological, scientific, space, institutional and international environment, where regulatory and contractual compliance is essential.

All persons within the scope of this Code must comply, depending on their activity, with:

- Applicable Spanish and European legislation.
- Applicable labour, tax, commercial, administrative and criminal law.
- Personal data protection regulations.
- Information security requirements.
- Occupational health and safety requirements.
- Applicable environmental requirements.
- Contractual commitments assumed with customers, public administrations, universities, research centres, suppliers and partners.
- The conditions of tenders, grants, subsidies, public procurement procedures or contracts.
- Internal rules, policies, procedures, guidelines and instructions in force at Quasar.
- Voluntary commitments assumed by Quasar towards customers, bodies, institutions or interested parties.

No internal instruction, commercial pressure, operational urgency or economic interest justifies breaching the law, this Code or internal policies.

7. Human rights and responsible labour practices

Quasar respects internationally recognised human rights and promotes decent, safe, fair and respectful working conditions.

Quasar rejects any form of:

- Child labour.
- Forced, compulsory or coerced labour.
- Modern slavery.
- Human trafficking.
- Labour exploitation.
- Degrading, intimidating, violent or abusive treatment.
- Discrimination, harassment or retaliation.

Quasar respects applicable labour rights, including equal opportunities, non-discrimination, occupational health and safety, the right of workers to communicate with management and, where applicable, the rights of representation, association and collective bargaining recognised by applicable law.

Quasar shall promote working conditions compatible with people's dignity and physical, mental and social well-being, within the applicable legal and organisational framework.

8. Information security, confidentiality and data protection

Information is an essential asset for Quasar. All persons within the scope of this Code must protect the confidentiality, integrity, availability, authenticity, traceability and, where applicable, non-repudiation of the information they process in the performance of their duties.

8.1. Confidentiality

The confidentiality of information belonging to Quasar, its customers, suppliers, partners, projects, employees and third parties must be maintained, even after the end of the employment, professional or contractual relationship.

Non-public information must not be disclosed unless there is express authorisation, a legitimate professional need and appropriate protection measures.

8.2. Proper use of information

Information must only be used for authorised professional purposes and within the framework of assigned duties. It is prohibited to use Quasar's or third parties' information for personal benefit, or for the benefit of relatives, friends, related companies or unauthorised third parties.

8.3. Personal data protection

Personal data must be processed lawfully, fairly, transparently, in a limited, secure and proportionate manner. Only authorised persons may access personal data and only when necessary for the performance of their duties.

8.4. Customer and project information

Technical, scientific, contractual, operational or strategic information relating to customers and projects must be protected with particular diligence. This includes, among others, technical documentation, source code, scientific data, project information, credentials, configurations, results, deliverables, communications and contractual documentation.

8.5. Security incidents

Any incident, suspected incident, security breach, loss of information, unauthorised access or improper disclosure must be reported immediately in accordance with the applicable internal procedures.

When the incident affects a customer, project or contractual relationship, Quasar shall act in accordance with its legal, contractual and information security obligations.

8.6. Publication of information

Information intended for external publication, including information published on the website, social media, commercial documentation or public communications, must be previously validated by the responsible persons in accordance with the applicable internal procedures.

9. Responsible use of corporate assets, systems and resources

Quasar's assets, systems, equipment, applications, accounts, credentials, cloud services, collaboration tools, networks, documentation and resources must be used responsibly, securely and in accordance with internal policies.

It is prohibited to:

- Use corporate resources for unlawful, abusive, discriminatory, offensive or unethical purposes.
- Share credentials or allow unauthorised access.
- Install unauthorised or unlicensed software.
- Extract, copy or transfer information without authorisation.
- Manipulate, alter, destroy or falsify records, evidence, documentation or information.
- Bypass security controls.
- Use Quasar's systems for unauthorised personal activities or activities that may compromise security.
- Access information, systems or areas for which no authorisation has been granted.

Each person is responsible for the proper use of the assets assigned to them and must report any loss, theft, incident, improper access or suspected compromise.

10. Intellectual property, industrial property and technical know-how

Quasar respects its own and third parties' intellectual and industrial property rights.

All persons within the scope of this Code must:

- Use software, documentation, data, content, libraries, images, publications, models, methodologies and tools in compliance with their licences and terms of use.

- Protect Quasar's technical, scientific and business know-how.
- Respect the ownership of results, deliverables, code, documentation or developments in accordance with the applicable contracts and agreements.
- Not reproduce, distribute, transform, publish or transfer protected materials without authorisation.
- Avoid using confidential information from previous employers, customers or third parties unless there is legitimate authorisation.

11. Relationships with customers, public administrations, universities, research centres, partners and suppliers

Quasar maintains professional relationships based on transparency, fair competition, technical quality, independence, integrity and fulfilment of commitments.

11.1. Customers

Customer relationships must be based on professionalism, honesty, fulfilment of requirements, protection of information and clear communication.

Commitments that Quasar cannot reasonably fulfil must not be assumed, and relevant information that may affect service delivery, security, contractual compliance or customer trust must not be concealed.

11.2. Public administrations

Quasar may participate in tenders, grants, subsidies, public programmes, institutional projects or contracts with public administrations.

In these relationships, Quasar shall act with special diligence, transparency and respect for the principles of equality, objectivity, free competition, integrity and compliance with the applicable conditions.

It is prohibited to improperly influence authorities, public officials, public employees, evaluators, funding bodies or any person involved in public procedures.

11.3. Universities, research centres and scientific institutions

Relationships with universities, research centres and scientific institutions shall be based on loyal collaboration, respect for intellectual property, scientific integrity, confidentiality and compliance with applicable agreements.

11.4. Suppliers and subcontractors

Supplier selection and management must be based on objective, professional and verifiable criteria, such as quality, security, solvency, technical capacity, compliance, price, experience, reliability and suitability for Quasar's needs.

Practices that could compromise independence of judgement, create undue favouritism or generate conflicts of interest shall not be accepted.

11.5. Fair and timely payment to suppliers

Quasar undertakes to maintain fair and reasonable payment practices with its suppliers, paying valid, correctly submitted and undisputed invoices in accordance with contractual and legal payment terms.

12. Corporate responsibility and sustainability in the supply chain

Quasar shall promote responsible conduct in its supply chain, particularly regarding suppliers, subcontractors, collaborators and partners involved in relevant projects or with access to information, systems, facilities, customers or critical activities.

Depending on the nature, size, criticality and risk of the relationship, Quasar may require its suppliers and collaborators to comply with principles equivalent to those set out in this Code, including:

- Legal, regulatory and contractual compliance.
- Respect for human rights.
- Decent, safe and fair working conditions.
- Prevention of child labour, forced labour and labour exploitation.
- Prevention of corruption, bribery, fraud, influence peddling and conflicts of interest.
- Protection of information and personal data.
- Respect for the environment and reduction of environmental impacts.
- Maintenance of truthful and traceable records.
- Appropriate mechanisms for reporting irregularities.

Where actual or potential adverse risks or impacts are identified in relation to human rights, the environment, information security, legal compliance or ethical conduct, Quasar may request mitigation, correction or improvement measures proportionate to the identified risk.

Where appropriate, Quasar may flow down to suppliers, subcontractors and collaborators specific requirements arising from customers, contracts, institutional projects or applicable rules.

13. Anti-corruption, bribery and improper advantages

Quasar maintains a zero-tolerance policy towards corruption, bribery, fraud, extortion, influence peddling, facilitation payments and any improper advantage.

It is prohibited, directly or indirectly, to:

- Offer, promise, give, request, accept or receive money, gifts, favours, commissions, discounts, invitations, services, personal advantages or improper benefits to influence a professional decision.
- Make facilitation payments to speed up procedures, obtain permits, avoid controls or gain advantages.
- Use intermediaries, consultants, partners, suppliers or third parties to perform actions that Quasar could not perform directly.
- Finance, conceal or facilitate improper payments.

- Manipulate tendering, grant, procurement, evaluation or award processes.
- Falsify documentation, invoices, records, costs, certifications, justifications or evidence.
- Offer advantages to public employees, customers, suppliers or third parties to obtain or retain business, contracts, grants, subsidies, privileged information or preferential treatment.

Any doubt regarding a possible corruption situation or improper advantage must be consulted before acting.

14. Fraud, misuse of resources and false records

Quasar rejects any form of fraud, deception, misappropriation, document falsification, record manipulation or misuse of resources.

It is prohibited to:

- Defraud or deceive Quasar, customers, suppliers, public administrations or third parties.
- Misappropriate assets, resources, information, funds or property.
- Submit false or incomplete information in offers, tenders, grants, reports, supporting documents, certifications, invoices, timesheets or records.
- Conceal relevant facts that must be reported.
- Manipulate evidence, audits, controls, deliverables or documentation.
- Use Quasar's resources for unauthorised personal purposes or purposes contrary to the law or this Code.

15. Gifts, invitations, hospitality and representation expenses

Gifts, invitations, courtesies and hospitality may create ethical, reputational, legal and conflict-of-interest risks. Therefore, they must be exceptional, proportionate, transparent and linked to a legitimate professional purpose.

15.1. General rule

It is not permitted to offer, promise, request or accept gifts, invitations, payments, favours, advantages or benefits that may influence, appear to influence or reward a professional decision.

15.2. Permitted courtesy gifts

Courtesy gifts may be accepted or offered only when all the following requirements are met:

- They are occasional.
- They have symbolic or moderate value.
- They have not been requested.
- They do not create an obligation of reciprocity.
- They do not coincide with tendering, negotiation, procurement, evaluation, grant, award or decision-making processes.
- They are socially and professionally appropriate.

- They can be communicated transparently without causing reputational damage.
- They do not breach the rules of the recipient's organisation.

As a general criterion, an indicative limit of EUR 50 per person and occasion is established, and a maximum of EUR 150 per year per third party.

15.3. Professional invitations

Invitations to meetings, events, seminars, training sessions, conferences, technical activities or professional meals may be accepted or offered when they have a legitimate purpose, are proportionate and are linked to the ordinary development of the professional relationship.

Luxury invitations, travel, accommodation, leisure, entertainment or activities not professionally justified shall not be accepted, unless previously and expressly authorised by Top Management.

15.4. Absolute prohibitions

It is prohibited to accept or offer:

- Cash or cash equivalents.
- Gift cards, cheques, vouchers or similar instruments.
- Personal loans.
- Commissions, kickbacks or hidden payments.
- Gifts or advantages addressed to relatives, friends or related persons.
- Luxury or disproportionate invitations.
- Facilitation payments.
- Gifts or invitations during tenders, grants, awards, inspections, audits, contract renewals or sensitive negotiations.
- Any advantage that may compromise independence of judgement.

15.5. Public administrations

In relationships with public administrations, funding bodies, authorities, public employees, evaluators, public universities, public entities or persons involved in public procedures, a particularly restrictive approach shall apply.

No gifts, invitations or courtesies of economic value shall be offered or accepted where there is any tendering, grant, award, justification, inspection, evaluation, authorisation or administrative procedure related to Quasar.

15.6. Register and authorisation

Any gift, invitation or hospitality exceeding the indicative limit, raising doubts or potentially creating an appearance of conflict of interest must be reported to Top Management before being accepted or offered. If prior reporting is not possible, it must be reported immediately afterwards.

Exceptions must be authorised by Top Management and documented.

Quasar may maintain a specific register of gifts, invitations, hospitality, sponsorships, collaborations and conflicts of interest as evidence of control and traceability.

16. Conflicts of interest

A conflict of interest exists when personal, family, economic, professional or third-party interests may influence, or appear to influence, a person's professional judgement in the performance of their duties for Quasar.

Conflicts of interest may include, among others:

- Participating in procurement, purchasing, selection or supplier evaluation decisions involving a personal, family or economic relationship.
- Holding economic interests in customers, suppliers, competitors or partners of Quasar.
- Performing external activities that compete with Quasar or interfere with professional performance.
- Using Quasar information for personal benefit or for the benefit of third parties.
- Unduly favouring a person, company or entity.
- Hiring or recommending relatives, friends or related companies without transparency.

Persons affected by a real, potential or apparent conflict must report it to Top Management and refrain from participating in the decision until the appropriate course of action has been determined.

When the conflict affects a contractual relationship, tender, grant, institutional project or customer, proportionate measures shall be adopted to protect the independence, transparency and impartiality of the decision.

17. Sponsorships, donations and institutional collaborations

Quasar may carry out sponsorships, donations or institutional collaborations on an occasional basis when they have a legitimate purpose, are aligned with its values and do not constitute a means to obtain improper advantages.

Any sponsorship, donation or institutional collaboration must:

- Have a legitimate professional, scientific, educational, technological, social, environmental or institutional purpose.
- Be previously approved by Top Management.
- Be sufficiently documented.
- Clearly identify the beneficiary entity and the objective of the collaboration.
- Not be linked to the improper obtaining of contracts, grants, licences, permits, awards or favourable decisions.
- Not be made in cash or through opaque mechanisms.
- Comply with applicable legislation and internal rules.
- Be proportionate to Quasar's size, activity and resources.

No contributions shall be made to political parties, electoral campaigns, candidates, political foundations or related entities where this may compromise Quasar's neutrality, independence or reputation.

18. Fair competition and market conduct

Quasar competes in the market fairly, honestly and professionally.

It is prohibited to:

- Obtain competitor information unlawfully or unethically.
- Disseminate false, misleading or disparaging information about competitors, customers, suppliers or third parties.
- Agree prices, market allocations, commercial conditions or strategies with competitors where contrary to applicable regulations.
- Manipulate procurement, tendering or award processes.
- Present capabilities, certifications, experience or references that are not real or verifiable.
- Use commercial, technical or contractual documentation that may be misleading.
- Act fraudulently, deceptively or collusively to obtain a competitive advantage.

19. Equality, diversity, respect and non-discrimination

Quasar promotes a professional environment based on equal opportunities, respect, diversity, inclusion and human dignity.

No form of discrimination, unfavourable treatment, harassment, retaliation or offensive conduct shall be tolerated on the grounds of sex, gender, sexual orientation, gender identity or expression, age, disability, origin, nationality, race, ethnicity, religion, beliefs, ideology, marital status, family situation, social condition, illness, physical appearance or any other personal or social circumstance protected by law.

Quasar shall foster, to the extent possible and proportionate to its size and activity, inclusion, equal opportunities and gender balance in recruitment, professional development, promotion, training and labour relations.

All persons must contribute to creating a safe, respectful, collaborative working environment free from violence, harassment or intimidation.

Quasar has a Protocol for the prevention and response to workplace harassment, sexual harassment, harassment based on sex and other conduct contrary to sexual freedom and moral integrity, which shall apply where appropriate.

20. Prevention of harassment and conduct contrary to dignity

Quasar maintains zero tolerance towards any conduct constituting workplace harassment, sexual harassment, harassment based on sex, digital violence, degrading treatment, intimidation, retaliation or conduct contrary to sexual freedom and moral integrity.

It is prohibited to:

- Make comments, jokes, insinuations, gestures, messages or engage in offensive, sexual, intimidating, humiliating or discriminatory conduct.
- Isolate, discredit, ridicule, threaten or professionally harm a person.
- Use digital media, email, messaging, social networks or corporate tools to harass, intimidate, defame, monitor, impersonate or disseminate unauthorised content.
- Retaliate against anyone reporting a harassment situation or cooperating in an investigation.
- Tolerate or conceal known harassment conduct.

Any person who suffers or becomes aware of harassment or conduct contrary to dignity may report it through the Whistleblowing Channel or through the means provided in the specific protocol.

21. Environment and sustainability

Quasar assumes a proportionate commitment to environmental protection, sustainability and responsible use of resources.

Quasar shall promote, in a manner proportionate to its size, activity and sphere of influence, the management of environmental risks and the reduction of impacts arising from its operations, services, purchases, projects and supply chain.

In particular, Quasar shall encourage:

- Energy efficiency.
- Reduction of direct and indirect emissions where possible.
- Reduction of resource consumption.
- Waste minimisation.
- Reuse and recycling.
- Reduction of single-use plastics.
- Responsible use of equipment, materials and services.
- Responsible digitalisation of processes and documentation.
- Reduction of unnecessary travel through remote collaboration tools, where appropriate.
- Consideration of environmental criteria in purchases, suppliers, events and activities where proportionate.
- Compliance with applicable environmental legal requirements.

Where appropriate, Quasar shall take into account the environmental, social and economic impact throughout the life cycle of products, services, processes or solutions developed, especially in technological, scientific or space projects.

All persons must contribute, from their position, to reducing unnecessary environmental impacts and using Quasar's resources responsibly.

22. Responsible sourcing of minerals and critical raw materials

Where Quasar's activity, purchases or projects involve the use, acquisition or integration of equipment, components, hardware, materials or supplies that may contain conflict minerals or critical raw materials, Quasar shall endeavour, proportionately to its ability to control and influence, to work with suppliers that apply responsible sourcing criteria.

This commitment includes avoiding, as far as reasonably possible, supply chains that may directly or indirectly contribute to human rights violations, financing of armed groups, labour exploitation or serious environmental impacts.

Quasar may request from suppliers reasonable information, certifications, declarations or evidence regarding the responsible origin of materials where the nature of the supply, project or customer so requires.

23. Records, documentation and accuracy of information

Documented information, records, evidence, reports, invoices, contracts, justifications, timesheets, technical documentation, communications and ISMS records must be truthful, complete, traceable and retained in accordance with internal procedures.

It is prohibited to:

- Falsify, alter, conceal or destroy records without authorisation.
- Manipulate evidence, audits, controls, deliverables or documentation.
- Record expenses, hours, costs, invoices or concepts that are not real.
- Submit misleading documentation in tenders, grants, justifications, audits or contractual relationships.
- Conceal relevant information that must be communicated for legal, contractual, security or compliance reasons.
- Alter records to conceal or misrepresent an operation, transaction, decision, expense or event.

Records must be retained in accordance with applicable internal, contractual and legal requirements.

24. External communication, image and reputation

Quasar's external communications must be truthful, prudent, professional and respectful.

Only authorised persons may issue public communications, institutional statements, corporate publications, commercial information, website content, social media content, media communications or official communications on behalf of Quasar.

On social media or in public environments, Quasar personnel must avoid statements that may be confused with official company positions if they are not authorised to make them.

Confidential, internal, sensitive, contractual, technical or customer information must not be disclosed through external channels without authorisation.

25. Whistleblowing Channel, queries and breaches

Quasar has an Anonymous Whistleblowing Channel enabled in Bizneo, which allows reports, complaints or possible irregularities to be submitted anonymously or with identification.

The channel may be used to report, among others:

- Possible breaches of this Code.
- Conduct contrary to the law or internal policies.
- Situations of harassment, discrimination, retaliation or treatment contrary to dignity.
- Possible cases of corruption, bribery, fraud, conflict of interest or improper advantage.
- Breaches relating to information security or data protection.
- Manipulation of records, documentation or evidence.
- Misuse of assets or information.
- Serious risks or impacts related to human rights, the environment, ethical conduct or the supply chain.
- Any other irregular conduct related to Quasar.

The Whistleblowing Channel is available through Bizneo and may also be used by third parties where appropriate.

Persons using the channel must provide truthful, sufficient information and act in good faith. False reports made in bad faith may give rise to appropriate measures.

26. Speak-up culture and protection against retaliation

Quasar shall promote a culture of open and responsible communication, in which employees, collaborators and third parties may raise questions, concerns or possible breaches without fear of retaliation.

Quasar shall ensure the confidentiality of communications received through the Whistleblowing Channel and of any investigations arising from them.

Where a report is anonymous, Quasar shall respect anonymity under the terms permitted by the tool and applicable regulations.

Any retaliation, threat, unfavourable treatment, discrimination or negative consequence against a person who reports a possible irregularity in good faith or cooperates in an investigation is prohibited.

The rights of the person reported shall also be protected, including the presumption of innocence, the right to be heard, confidentiality and fair treatment during the process.

27. Internal investigation and cooperation

Reports received shall be analysed and, where appropriate, investigated objectively, impartially, confidentially and proportionately.

All persons within the scope of this Code must cooperate with internal investigations when required, providing truthful information and maintaining confidentiality.

Where the facts may constitute a criminal offence or serious infringement, Quasar may adopt precautionary, disciplinary, contractual, corrective measures or report the matter to competent authorities, in accordance with applicable legislation and internal procedures.

28. Consequences of non-compliance

Failure to comply with this Code, the law or internal policies may give rise to measures proportionate to the seriousness of the facts, in accordance with applicable regulations, contracts, the collective bargaining agreement, labour legislation and internal procedures.

Consequences may include, among others:

- Warnings or corrective requirements.
- Training or awareness-raising measures.
- Review of permissions, functions or responsibilities.
- Disciplinary measures.
- Termination of contractual relationships with suppliers, collaborators or third parties.
- Reporting to competent authorities where appropriate.
- Claiming damages where applicable.

Measures shall be applied while respecting the rights of the persons concerned and applicable regulations.

29. Training, communication and acknowledgement

Quasar shall communicate this Code to the persons within its scope and promote awareness through appropriate internal and external channels.

Quasar personnel must know and respect this Code, as well as the related policies and procedures.

Where appropriate, Quasar may request express acknowledgement of this Code from employees, collaborators, suppliers or third parties.

Quasar shall promote training, information or awareness-raising actions to help persons within the scope of this Code make ethical, responsible decisions aligned with the organisation's values.

30. Review and continuous improvement

This Code shall be reviewed periodically and, in any case, whenever relevant changes occur in:

- Quasar's activity or structure.
- Applicable legislation.
- Requirements from customers, public administrations or interested parties.
- The Information Security Management System.
- Identified risks.
- Related internal policies.
- Results of audits, investigations, incidents or corrective actions.
- Expectations relating to corporate responsibility, sustainability or ethical conduct applicable to Quasar as a supplier, contractor or collaborator.

The review and update shall be coordinated by Top Management and the designated responsible persons, in accordance with the internal document management process.

31. Related documents

This Code is complemented, among others, by the following internal Quasar documents, in their current version:

- Política de Seguridad de la Información (Information Security Policy).
- Specific ISMS policies.
- Guía del Usuario (User Guide).
- IT07-01 Clasificación de la Información (Information Classification).
- Plan de comunicación (Communication Plan).
- Protocolo para la prevención y actuación frente al acoso laboral, acoso sexual, acoso por razón de sexo y otras conductas contrarias a la libertad sexual y la integridad moral (Protocol for the prevention and response to workplace harassment, sexual harassment, harassment based on sex and other conduct contrary to sexual freedom and moral integrity).
- Manual del Canal de Denuncias (Anonymous Whistleblowing Channel Manual).
- Applicable ISMS process sheets.
- Declaración de aplicabilidad (Statement of Applicability).
- Human Resources, information security, supplier management, legal compliance, document management and incident management procedures.
- Register of gifts, invitations, hospitality, sponsorships, collaborations and conflicts of interest, available in Sofidya.
- Requirements, codes or corporate responsibility commitments applicable due to customer, contract, tender, grant or institutional collaboration.