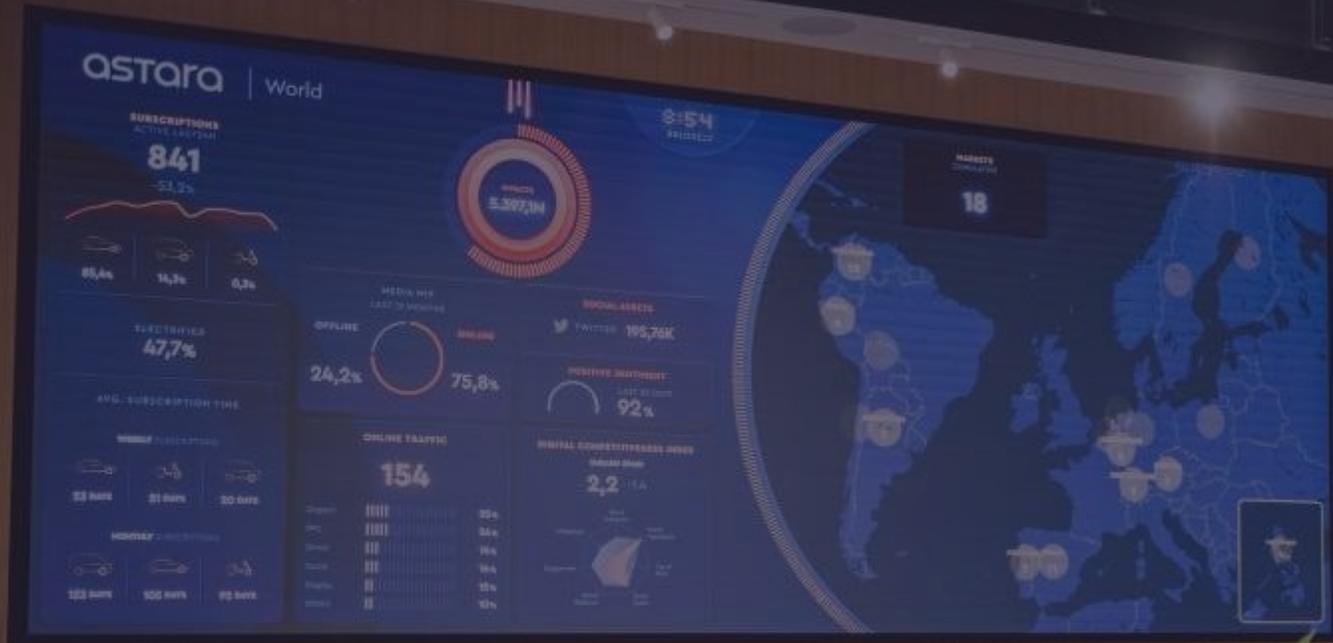


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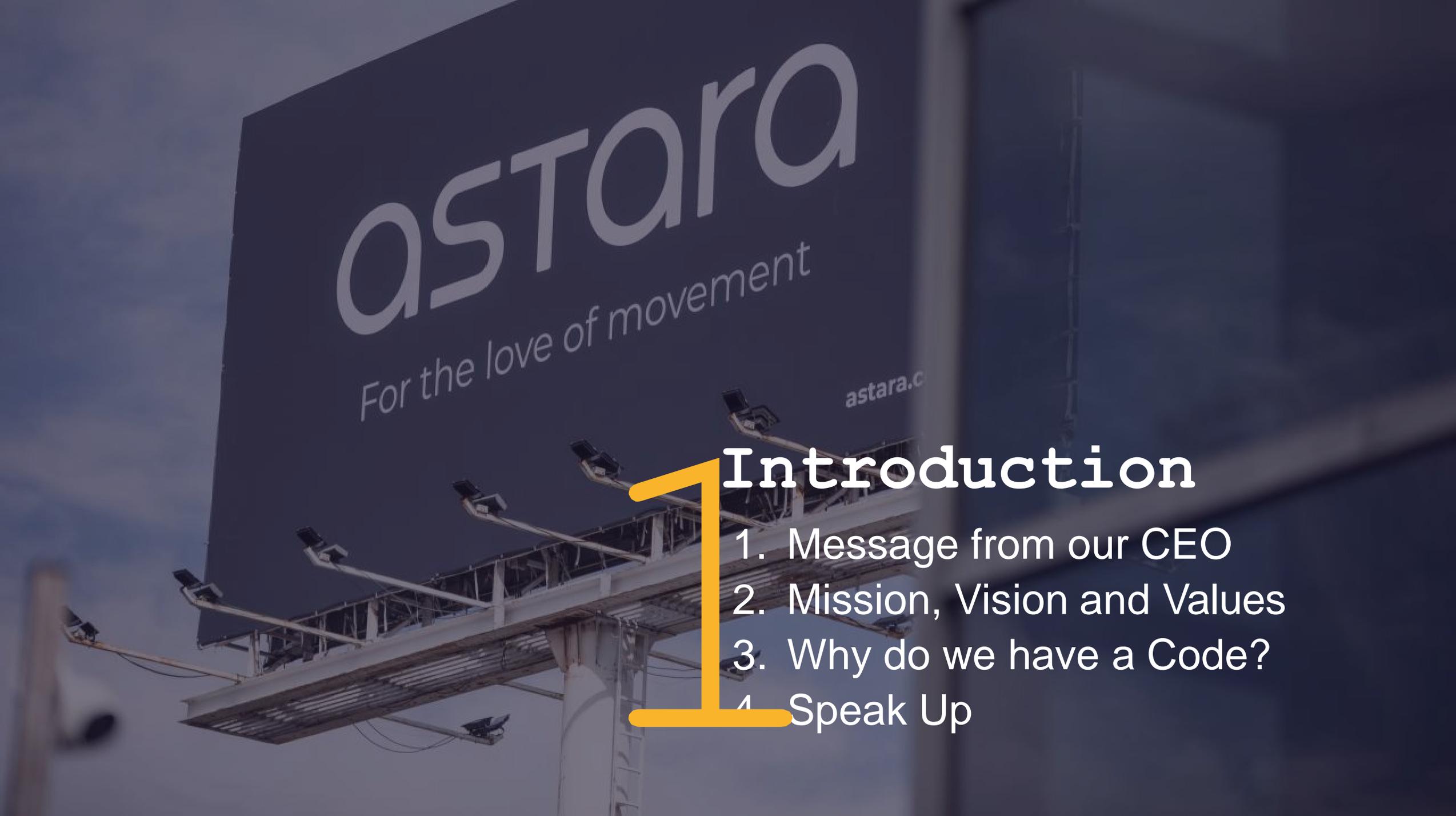
CODE OF ETHICS



DECEMBER 2023

Index

1. Introduction
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A large billboard for ASTARA is shown against a dark sky. The billboard features the company name 'ASTARA' in a large, white, sans-serif font. Below the name is the slogan 'For the love of movement' in a smaller, white, sans-serif font. In the bottom right corner of the billboard, the website 'astara.c' is visible. The billboard is supported by a metal structure with several spotlights attached to it.

ASTARA

For the love of movement

astara.c

1 Introduction

1. Message from our CEO
2. Mission, Vision and Values
3. Why do we have a Code?
4. Speak Up

1. Message from our CEO



Jorge Navea
CEO of astara Mobility

At Astara, we are committed to principles and values that have been essential to our company's development. Our growth has been built on the trust placed in the company by its employees, customers, shareholders and other collaborators. I am proud to say that one of the reasons that make us worthy of such trust is that, for us, performing our work in an ethical, professional, integral, responsible and transparent manner is essential. Therefore, all of us at astara must safeguard these principles, which we must also pass on to all those with whom we interact in our professional activities. Maintaining this trust is everyone's responsibility.

This new astara Code of Ethics is inspired by these principles and values, and includes the elements that we believe are essential to the relationships of our companies and our employees with our various stakeholders. This document is intended to show the principles that guide the way we operate as a company and the way we expect our employees and business partners to act. It constitutes a reference guide for Astara's operations, bringing together the formal and informal interests of the company with the legitimate interests of our stakeholders, and focuses on the commitment to create value for astara and for society at large.

We want our culture of transparency, honesty, compliance and integrity to remain the foundation for successful and sustainable business growth. But also the human development of all those who are part of the astara ecosystem. To achieve this goal we rely on the engagement of you all.

Also remember that astara has implemented an internal ethical channel, through which you can bring to the company's attention any breach of these rules that we now share with you.

Please take some time to read and understand the Code of Ethics. We should all be aware of how important it is to comply with its ethical standards. If you have any questions after reading it or during your activity, please do not hesitate to contact the Compliance Committee, where you will find the help you need.

2. Mission, Purpose and Values

MISSION

**Move, It's
your right**

VISION

**At astara, we defend people's instinct to move as a
lever for progress and growth.**

VALUES



Courage: We believe in the need to change to move forward. We act with determination to achieve progress, using the power of data to lead change.



Open-minded: Our curiosity pushes us towards other visions, points of view and future trends. We value the diversity of experiences, skills and ideas. We listen to our customers, employees, partners and shareholders to explore new opportunities, creating collaborative relationships based on trust.



Innovative: We imagine, create and develop new ways to solve mobility challenges. Our disruption will help people move in a better and smarter way.



Human: We are committed to making a positive impact on people's real lives. We are loyal to our commitment to human progress, empowering our teams to make meaningful and impactful contributions, aligned with astara's purpose.

3. Why do we have a Code?

The purpose of the Code of Ethics is to establish Astara's standards and conducts to make us aware of the values and behaviours we must comply with.

Some of the behaviours described are more focused on Astara's commitment to its employees and others on astara's commitment to third parties (mainly suppliers and customers). Likewise, within the Code of Ethics we describe astara's commitment to comply with the laws and regulations that directly or indirectly affect it

At astara, we seek to create a frame of reference for ethical and responsible decision making and to establish clear expectations about the behaviours expected of its employees and managers. Which are they?



We are committed to periodically reviewing and updating our Code of Ethics to formally ensure that our mission, vision and values are always aligned with our operations.

TO WHOM DOES THIS CODE APPLY?

The Code of Ethics applies to all employees of Astara Mobility and all its subsidiaries, including management bodies, senior management and employees. Astara's third parties (customers, suppliers, partners, etc.) must be familiar with and accept this Code of Ethics.

WHAT IS MY RESPONSIBILITY WITHIN ASTARA?

Acting with integrity implies complying with established policies and that all actions we take are ethical and in accordance with the behaviours expected by Astara of each employee.

It is of utmost importance that we are committed to Astara's values, ensuring that they are reflected in all our actions.

We must all comply with the Code of Ethics, and with the laws and regulations of the countries where astara has a presence, in order to preserve the reputation we have built. In case of doubt always follow the strictest standard. Not only is it a right, but also an obligation.

4. Speak up

astara has an Ethics Channel through which you can inform your Hub's Compliance Committee of misconduct in the Company.

All communications are treated as strictly confidential. More information can be found on the link to the [Ethics Channel](#).

2

Ethics and transparency

1. Bribery and Corruption
2. Corporate gifts
3. Competition and Antitrust

1. Bribery and Corruption

GOAL

Our success is based on the quality of the services we provide to our clients, with a stance of respect and firm ethical and legal compliance in all activities conducted by Astara.

Astara employees take a zero-tolerance stance on bribery and corruption in our day-to-day activities, and in the entire value chain.

ASTARA COMMITMENT

We are committed to complying with all anti-bribery and anti-corruption laws wherever astara is present and expect all employees and third parties in the value chain working with and for us to comply with the provisions of this Code of Ethics.

Thus, no astara employee offers, promises or accepts money for purposes of obtaining an unlawful business or commercial advantage.

On the other hand, astara employees, as a sign of our commitment to zero tolerance, we must apply the procedures in place to know our third parties, and avoid any relationship with those who do not share our commitments and values.

DANGEROUS COMMENTS

"Don't worry, in this country we do business this way."

"There is no need to approve this payment."

"There is no need to analyse the supplier, he is reliable."

What would happen if...?

I know someone who works on the sales team.

The person I know asks me if I would be willing to hire a relative of his/her to work. Would it be correct if I offer such a position to my colleague's relative or even lobby internally for the position?

BE ALERT TO THESE BEHAVIOURS

- Lack of transparency and traceability of transactions or expenses.
- Making cash payments.
- Requesting high commissions/provisions compared to market practice.
- Making a payment to a third party outside the contractual framework.
- Making a donation to any organisation or institution in exchange for a benefit.
- Accepting any gift that affects your objectivity (whether it is a trip, money, promises, gifts or charitable contribution).

EXAMPLES OF SUSPECTED BRIBERY OR CORRUPTION



GIFTS



PROMISES



TRIPS



CHARITABLE CONTRIBUTION

It is very important to check our policies before offering or accepting anything of value, and in case of doubt, contact your Hub's Compliance Committee.

If you have any questions, please refer to our ["Anti-Corruption and Anti-Bribery Policy"](#)

No. All decisions related to personnel hiring must be approved by the People Department. Offering a position to a relative of a co-worker or pushing for more special consideration can be considered an example of corruption. If you have any questions, please contact the People Department or your Hub's Compliance Committee.

2. Corporate gifts

GOAL

Our goal is to promote transparency and integrity in the activities in which gifts are exchanged or given, so that both employees and third parties (customers, suppliers or partners of astara), are aware of the conditions and principles by which we must abide when giving and/or receiving any gift.

At Astara we do not accept gifts that exceed the established requirements and that could be interpreted as favoured treatment in relation to any activity linked to the Company.

ASTARA COMMITMENT

We are firmly committed that any exchange of gifts we make with a third party must not influence the Company's decisions.

We listen to our customers and our suppliers. However, we avoid engaging in commercial gift exchanges that may be against the law or that may have a negative impact on the Company.

DANGEROUS SITUATIONS

- Any exchange of gifts of great value that can:
 - Exercise pressure on the recipient to return the gift through a favour that benefits the benefactor
 - Make the recipient feel indebted to the employee/ Company
 - Create a conflict of interest situation or the perception of a conflict of interest
- Give or receive any inappropriate gift, especially **cash** gifts or **gift cards**.
- Give or receive any gift when close to the renewal or closing of a contract.
- Receive or give a gift and not declaring it through the relevant Company channels

If you have any questions, please contact your Hub's Compliance Committee.

WHEN TO ACCEPT OR NOT TO ACCEPT A GIFT...

ACCEPT: Compliments or gifts of courtesy or of symbolic value may be accepted if they also meet the following requirements simultaneously:

- Do not infringe the principles of ethical conduct and transparency adopted by astara.
- Are permitted according to the legislation in force and the internal regulations of each country.
- In case of doubt, check with your Hub's Compliance Committee.

REJECT:

- Gifts in exchange for a commercial action or favour.
- Exchange of cash or gift cards.
- Gifts of great value or professionally inappropriate.

What would happen if...?

I was recently with a supplier who wanted to give me a gift of great value. What should I do if this situation occurs?

Any gift of great value should be refused by any astara employee.

If it is a gift in accordance with standard practice, e.g. a food basket, tickets, etc., and meets the above-mentioned requirements, it may be accepted.

If you have any questions, please refer to our "[Anti-Corruption and Anti-Bribery Policy](#)"

3. Competition and antitrust

GOAL

Our goal is to compete honestly and fairly to achieve a balance between competition and ethics with our competitors and to avoid behaviours that directly or indirectly lead to anti-competitive situations.

By fostering fair competition, Astara has a greater opportunity to grow and expand in the market, driving innovation and the development of new technologies.

ASTARA COMMITMENT

We are committed to complying with antitrust laws and regulations and seek to ensure that all our business practices are fair and do not harm other competitors.

Many business partners are involved in the operation of our business and we are therefore firmly committed to act with determination and to choose conscientiously which third parties to collaborate with, on a level playing field with our competitors.

We are also committed to fair competition, which allows us to have a good reputation in the market and to generate trust among customers and competitors.

SERIOUS INFRINGEMENTS OF COMPETITION RULES

- Discussing with competitors (including their employees or agents) about prices or other business terms and conditions
- Sharing customers or areas with our competitors
- Agreeing with other competitors to boycott a third party
- Establishing or intervening in the retail prices at which our distributors or dealers sell their products

WHAT CAN YOU DO TO PRESERVE COMPETITION?

Be mindful of your speeches during events, conferences or trade shows, be careful about conversations with your competitors and avoid bringing up topics related to:

- Prices
- Costs
- Terms or conditions of sales
- Marketing strategies

WHAT CAN YOU DO TO AVOID UNFAIR COMPETITION?

- Be honest with all astara customers.
- During the negotiation, avoid using a competitor's name to make a comparison that is not entirely true.
- When you are in the process of negotiating a proposal from astara, present the Company's portfolio of services and do not include activities that are outside the services provided by Astara.
- Do not advertise Astara in a way that may be misleading or that denigrates the competition

In case of doubt, please refer to our "[Competition Policy](#)"

3

People

1. Conflict of Interest
2. Data Protection
3. Diversity, Equity and Inclusion
4. Anti-discrimination and Harassment

1. Conflict of Interest

GOAL

Our goal is to establish the procedures to be followed by both employees and third parties, protecting the interests of astara and all employees. We must avoid putting our personal interests ahead of Astara's interests.

We have an obligation to train all employees to recognise conflicts of interest and understand how to avoid or manage them appropriately. Every decision we make inside or outside of astara must be objective and therefore prevent personal interests from influencing actions within the Company.

We seek to maintain astara's trust and reputation, avoiding any behaviour that could be perceived as unethical or unprofessional.

ASTARA COMMITMENT

Astara has a Conflict of Interest Policy, which establishes the principles and procedures to be followed by employees to avoid situations that could lead to a conflict between astara's and personal interests.

We are committed to preventing any situation that could generate a conflict of interest and to this end, we promote transparency in our activities and communications.

In addition, astara has an Ethical Channel for employees to report any conflicts they detect.

BE ALERT IN CERTAIN SITUATIONS

- Any situation where your personal/family interests may conflict with Astara's interests.
- Working for your customers or suppliers in addition to and simultaneously with your work at astara.
- Any investment in either a customer or a supplier.
- Any commercial contract that has a relative or close friend as a counterparty.

If you have any questions, please refer to our "[Conflict of Interest Policy](#)"

DANGEROUS COMMENTS

- "I want to close a contract with this supplier, you work with them right?, could you put in a good word for me?"
- "Actually in this case we could talk to my brother-in-law who works in this company and..."

All these comments are very dangerous and not raising your hand can lead to a conflict of interest issue that can affect both you and astara.

2. Personal Data Protection

GOAL

At Astara we aim to comply with the current regulations applicable to personal data protection.

To this end, we have established the guidelines and principles that astara must follow to ensure the protection and privacy of all personal data processing.

ASTARA COMMITMENT

We have the firm commitment to adequately safeguard the personal data accessed by astara in the performance of its activity. To this end, we ensure that the process of collecting and storing them complies with the guarantees of confidentiality, integrity and availability. Data is collected in a transparent and fair manner, by making available our privacy policies, obtaining the consent of the parties involved, if necessary.

We take our data protection responsibilities and obligations very seriously and expect both employees and third parties with access to such data to be committed to their obligations to preserve the confidentiality of any personal information.

Astara has a Data Protection Policy to guarantee the privacy and security of personal information of all players involved in Astara's operations.



BE ALERT TO THE DISSEMINATION OF PERSONAL DATA

It is important to know the type of information in order to be more aware and therefore more responsible when processing it.

Below is a breakdown of some information concepts classified as personal data which can be checked in the Data Protection Policy.

- Name and surnames
- DNI (National Id)
- Banking information
- Salary information
- Email
- Medical information
- Political and religious affiliation

If you have any questions, please check our "[Data Protection Policy](#)"

DATA PROTECTION ADVICE



Astara has security measures in place. Please rely on all of them to comply with our Data Protection Policy.



As an Astara employee, you must **raise** awareness of data security to everyone around you.



Do not share personal data of employees or third parties without prior consultation with the Legal Department



Keep your computer safe and pay attention to data protection **updates**



3. Diversity, Equity and Inclusion

GOAL

Our goal is to foster a fair, equitable and respectful work environment for all employees, regardless of their origin, gender, race, sexual orientation, religion or any other personal characteristic.

At astara, we want all employees to feel valued and respected as individuals, and to have equal opportunities to grow and develop professionally within the Company.

ASTARA COMMITMENT

At astara we want to progress and have a direct impact on employees, fostering a fairer and more respectful work environment for all employees and also towards third parties, regardless of their origin or circumstances.

To achieve progress, we act with determination by advocating equal opportunity, suppressing bias and promoting inclusion in the Company.

astara is committed to comply with the principles of the International Labour Organization (ILO), related conventions and applicable local law, on Diversity, Equity and Inclusion.

In addition, we have an Anti-Discrimination and Harassment Policy that seeks to promote the integration of diverse talents, multiculturalism and the integration of people with different skills.



PUT IT INTO PRACTICE

As an astara employee, you have a role to play in making Diversity, Equity and Inclusion move forward:



Express yourself freely: Do not be afraid to share your experiences or opinions.



Active and empathetic listening, fostering environments conducive to dialogue.



Recognise and value the ideas or opinions of others.



Ask questions, respect their answers and keep an open mind.

UNACCEPTABLE COMMENTS

Below are different examples of types of comments that go against a person's integrity and should be completely eradicated:

- Sexist comments: Any comment that refers to a person's gender in a negative or stereotypical manner that may be offensive.
- Racist comments: These can be extremely offensive and harmful. These comments refer to race in a pejorative or derogatory manner.
- Homophobic comments: Making comments that belittle people because of their sexual orientation.
- Comments related to different skills: Making comments that minimise or ridicule those with special skills are inappropriate. These are harmful comments that can make people feel left out.

If you have any doubts, please check our "[Prevention and Intervention Protocol against sexual and gender-based harassment](#)"

4. Anti-discrimination and Harassment

GOAL

We are committed to a policy of equal opportunities aimed at creating a positive impact on employees and establishing a safe and respectful work environment that helps to bring out the potential of each person.

Under no circumstances do we tolerate discriminatory or harassing attitudes toward employees or third parties, nor do we permit their unfair treatment.

ASTARA COMMITMENT

Discrimination and harassment are unacceptable behaviours that go against the freedoms and rights of employees and are firmly rejected by astara. We are committed to fostering and promoting equality and inclusion to combat them.

At astara we promote the importance of reporting any discriminatory and/or harassing behaviour and to this end, we have an Anti-Discrimination and Harassment Policy.

PUT IT INTO PRACTICE

Below are a series of guidelines that we propose to help you prevent discriminatory or harassing behaviour:

- Avoid any behaviour that may create a hostile work environment (avoid any inappropriate comments or jokes).
- Treat everyone around you fairly. Never single out anyone for reasons unrelated to work (gender, origin, sexual identity, etc.).
- Always maintain the same behaviour both inside and outside the company (client meetings, team dinners, etc.).

UNACCEPTABLE COMMENTS

Discriminatory or harassing comments are those that make reference to race, gender, sexual orientation, religion, different skills, age, nationality, among others, with a negative, offensive or derogatory connotation.

- **Racist comments:** Any comments that refer to a person's race in a derogatory manner or offensive racial stereotypes that discriminate against or harass the employee.
- **Homophobic comments:** Any discriminatory comments about a person's sexual orientation, or about social stereotypes or stigmas.
- **Sexist comments:** Any comment related to a person's gender with a negative, offensive or derogatory connotation is discriminatory. These comments may include unwanted sexual advances, sexist jokes or teasing, comments about a person's physical appearance.
- **Mobbing:** Comments or actions that cause intimidation or harassment within the work environment and lead to isolating the person.

If you have any doubts, please check our "[Prevention and Intervention Protocol against sexual and gender-based harassment](#)"

An aerial photograph of a vast palm tree plantation. A narrow road runs vertically through the center-right of the image, with a white car driving on it. The palm trees are densely packed and appear as a textured green canopy.

4

Our planet

1. Our commitment to sustainability

1. Our commitment to sustainability

GOAL

Our goal is to promote a sustainable and responsible culture, to reduce the impact of our actions on the environment and to contribute to the development of society as a whole, positively impacting the community and the environment

To this end, we are committed to the sustainable development of the business, through investments and behaviour in line with best practices in sustainability, focusing on decarbonisation and sustainable waste management

It is mandatory that all astara employees follow the sustainability and environmental guidelines, aimed at minimising the impact of our activities and the use of resources (equipment, facilities, means of work, etc.).

ASTARA COMMITMENT

We are aware of our responsibility to society, so we are committed to promoting environmental education and awareness among our employees, customers and suppliers so that we can work together in a collaboration to protect the planet.

We also promote the search for innovative solutions to reduce the environmental impact of our activities.

astara's tax policy is also based on a commitment to ethical principles, good corporate governance, transparency, sustainability and social responsibility.

Finally, we have a Sustainability Policy that is in line with our commitment to promote a more sustainable and responsible world.

If you have any questions, please check our "[Sustainability Policy](#)"



PUT IT INTO PRACTICE



Save energy and water: Turn off electrical equipment when not in use and make sure the lights and air conditioning are off when no one is in the office. Use water efficiently and do not waste it.



Use sustainable products: be aware of the use of office resources, such as recycled paper, environmentally friendly and green cleaning products.



Get involved in sustainability initiatives in the office and foster a culture of sustainability among your colleagues, encouraging them to adopt sustainable practices in their day-to-day work. Use an electric vehicle whenever possible



UNADVISABLE SITUATIONS

Respecting the planet is a task to which we must all contribute. It is of utmost importance to be aware of the negative effects that can occur if we look the other way and do not contribute to the sustainability of the planet.

Situations that go against the sustainability of our planet:

- Failure to encourage the use of sustainable materials.
- Not having clauses that encourage our suppliers to be more sustainable.
- Unnecessary energy consumption (phantom consumption)
- Using office resources inefficiently.



astara

MOVE. IT'S YOUR RIGHT