

# Code of Ethics

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## **1. Introduction**

### **1.1. Our Code of Ethics**

The purpose of this Code of Ethics (hereinafter referred to as “the Code” or “the Code of Ethics”) is to set out Startical’s principles and values.

The Code’s main objective is to constitute a formal and institutional reference for professional conduct, thus guaranteeing ethical and responsible behavior in all activities performed in Startical.

### **1.2. Objectives and scope of application**

The Code of Ethics is a manifestation of Startical's values and is intended to serve as a guide for the actions of all our professionals and the entities that work with us, and applies to each one of the directors, managers and employees of Startical.

Also, any third party who, in any way, act on behalf of Startical must comply with the provisions of this Code of Ethics.

In the same way, Startical requires all third parties with whom it relates in its professional activity the highest standards of compliance with the law (hereinafter, the “subject persons” referred to all).

## **2. Who we are: our Mission and Values**

### **2.1. Our Mission**

Startical is a reference company in the air navigation sector focused on technological innovation. The Company emerged as a result of the joining between Indra and ENAIRE.

Startical is aimed to provide a solution both nationally and internationally, within the sector of global satellite provision of air navigation services, generating a great impact in the economy and the society and contributing to the development of air traffic management.

Startical’s mission is extending coverage in air mobility by establishing new air routes and decongesting current ones, which brings benefits such as efficiency in the monitoring of data and voice communications, more efficient in personal flights and contributing to the development of air transport.

### **2.2. Our Values**

Startical's professionals strive for excellence in the development of their activity through continuous collaboration with different stakeholders. To guide their actions, five basic pillars have been established that constitute Startical's values:

- Commitment to society: Security as the main priority and development of environmentally sustainable solutions.

- Proactivity and innovation: Continuous improvement is the Company's motivation, promoting innovative solutions such as the use of advanced AI and Big Data capabilities in satellite communication.
- Customer orientation: Startical provides efficient and effective services based on the needs and expectations of the customers.
- Responsibility and teamwork: People are the Company's strength and transform individual capacity into collective achievements towards common goals.
- Transparency and good governance: Subject persons must act with ethics, honesty, trust and transparency.

### **3. Standards of Conduct**

Preserving Startical's values require training professionals in the risks they are exposed and establishing specific guidelines for action. This Code of Ethics applies to all the company's operations and complements the general standards, guidelines and rules existing in the Company.

#### **3.1. Compliance with legislation**

Startical is committed to carrying out all of its activities in accordance with current legislation in all of its areas of activity and in all of the countries in which it operates.

Subject persons are expected to respect external and internal laws and regulations as an unavoidable obligation. Consequently, they must avoid any conduct that, while not violating the law, contravenes the values, principles and ethical behavior established in this Code.

#### **3.2. Commitment to society**

##### **3.2.1. Responsible innovation and respect for the environment**

Startical integrates sustainable and socially responsible innovation into its management processes, with the aim of generating services and solutions that add value to society and generate a positive impact.

The Company promotes respect for and protection of the environment. For this reason, the company has an environmental policy that focuses on protecting the environment and contributing to the sustainable development of air transport.

At Startical we analyze our projects, whether airspace or construction projects, from an environmental point of view in order to minimize the impact we have on the territory, taking into account their location and territorial protection.

Professionals must not only act, always, in accordance with the Company's standards, but must also make the policy known to external parties with whom they establish business relations.

### **3.2.2. Building trusting relationships**

Startical promotes the development of external professional relationships in a broad sense, with organizations, external professionals and especially with customers and suppliers, as long as they contribute to preserve one of the most valuable assets, the Company's corporate image and reputation.

#### *3.2.2.1 Fight against Corruption and Influence Peddling*

Startical has developed an Anticorruption Policy that demonstrates its zero tolerance towards any practices that could be considered as corruption and assumes the obligation to eradicate any form of corruption and influence peddling within the Company.

Subject persons undertake not to request, accept or offer any type of payment, gift, compensation, or external benefit that, due to its value, could be interpreted as anything other than a detail.

#### *3.2.2.2 Relations with governments, public agencies and authorities*

Relations with any kind of authorities shall be guided by institutional respect, transparency and compliance with the law and internal rules.

With regard to unlawful activities, we shall always try to do our utmost to detect and report them. To this end, Startical requires an unavoidable commitment to collaborate with the judicial, administrative and supervisory authorities, complying scrupulously at all times with their orders and resolutions.

Startical will not directly or indirectly finance, neither in Spain nor abroad, political parties, their representatives or candidates.

The information sent on behalf of the company shall under no circumstances contain misleading, fictitious or insufficiently verified data, especially in the field of obtaining subsidies, which must be subject to compliance with the applicable regulations in force at all times.

#### *3.2.2.3 Procurement and recruitment procedures*

The Company undertakes to ensure that the procurement and recruitment procedures are carried out in an appropriate manner, following the guidelines established by current regulations.

The professionals involved in the selection of suppliers shall avoid any situation that may affect their impartiality and professional objectivity, disclosing any possible situation of conflict and refraining from participating in the selection in question.

Where applicable, suppliers shall be responsible for ensuring that the companies subcontracted by them work in compliance with the values, principles and standards contained in this Code and within the corresponding legal framework.

Startical has developed a set of rules, management processes and communication systems with its Suppliers that substantiate the principles of Corporate Responsibility in its contracting activity:

- Transparency and satisfaction of stakeholders' needs
- Best practices
- Environmental, labor, social and safety standards

#### *3.2.2.4 Subsidies and public aids*

Subject persons must proceed with absolute truthfulness in all phases of the public aid and subsidy management process.

Subsidies and public aid are granted subject to compliance with a certain related purpose and specific conditions, which must be properly accredited to the body granting them, both in the application/granting phase and in the execution phase of the project that constitutes their object. In this sense, each participant or actor in a process to secure subsidies and public aid must bear in mind that the following actions are strictly forbidden at Startical.

#### *3.2.2.5 Donations and sponsorships*

Donations and sponsorships must satisfy criteria of reasonableness, proportionality and prudence in the circumstances in which they are made and must be aligned with the organization's strategy and objectives.

Any collaboration, sponsorship or patronage carried out by the Company must be expressly authorized and may only be carried out with organizations or institutions with the highest level of reputation. In the interest of transparency, donations and sponsorships shall be conveniently recorded in the Company's accounting books and shall be subject to effective monitoring.

Subject persons are systematically forbidden to make unjustified donations or sponsorships or to do so for illegal purposes and must therefore comply with the procedures established internally for this purpose.

#### *3.2.2.6 Representation expenses and others*

Expenses incurred by persons working for the company in the course of their work (travel, meals, hotels, communications, etc.) must be strictly related to the work activity and must be supported by documentary evidence.

#### *3.2.2.7 Political or associative activities*

Startical respects the rights of association and political participation of its professionals as citizens. However, such activities may not interfere with the exercise of their functions. Therefore, the professional shall ensure that the linkage, membership, or collaboration with political parties or other entities with public purposes, keeps the Company completely out of the way.

Startical will not directly or indirectly finance, neither in Spain nor abroad, political parties, their representatives or candidates.

### **3.3. Professionals as Startical's best value**

#### **3.3.1. Professional competence and dedication**

Professionals must be involved in their own professional development in order to be aligned with the quality standards required by Startical. Likewise, they shall act in accordance with the principles of efficiency, economy and efficiency, and shall always watch over the achievement of the general interest and the fulfillment of the Company's objectives.

The Company's objective is to achieve greater professional development of personnel and increase their motivation. The Company is deeply committed to improving the training of its professionals, making it progressively more specific and adapted to the jobs and their evolution. In the same way, a commitment is expected from the members of the Company and attention to the development of the Objectives and Strategic Plans of Startical's General Management within the scope of its competences.

It is everyone's responsibility to foster an environment of professionalism and compliance with the law. Therefore, responsible and upright behavior is expected from all the professionals that make up the Company, which is incompatible with the use of drugs and alcohol during working hours.

The Company encourages participation, collaboration, and continuous coordination among internal units, as well as with the different stakeholders (clients, entities and national and international organizations), according to the level of responsibility and competence of the professional.

#### **3.3.2. Independence and conflicts of interest**

All Subject must maintain and ensure impartiality in the performance of our functions, responsibilities and professional decisions, especially in any situation that could involve a conflict of interest.

The Company considers that a conflict of interest arises when a subject person must make a professional judgment and this may be compromised due to a personal interest or a professional interest unrelated to Startical, affecting the objectivity and loyalty of the subject person to Startical and the decision adopted.

Startical has developed a Conflict of Interest policy that establishes guidelines for professionals in this situation. When faced with a situation of potential conflict of interest, professionals are expected to immediately report the situation and always act with professionalism, loyalty, honesty and in defense of Startical's interests.

Extreme caution shall be exercised when in the professional activity carried out there are personal relationships of any kind (for example, friendship or close relatives) or legal persons whose control is exercised by them.

#### **3.3.3. Work-life balance**

The promotion of a work environment and climate that is compatible with the personal and family life of professionals must be addressed from an integrated perspective, with everyone working together

to reconcile work requirements with family responsibilities and personal needs in the best possible way.

#### **3.3.4. Fair treatment**

Startical encourages the creation of a multidisciplinary environment that favors teamwork and respect among all professionals. The Company condemns all types of forced, compulsory or coerced labor.

In this sense, it promotes that labor relations are established on the basis of fair, courteous and respectful treatment by superiors, subordinates and peers.

Startical is strongly committed to promoting an integrated environment in which people with disabilities or reduced mobility have at their disposal means adapted to their needs.

Discrimination and harassment on the basis of race, religion, nationality, gender, disability, age, or any other grounds will not be tolerated.

#### **3.3.5. Professional development and promotion of equality**

Startical considers professional success as a joint project between the company and its professionals. Therefore, it provides them with the means to keep the necessary knowledge and skills up to date in a flexible manner, adapting to the professional profile.

Startical's administrators, directors, managers and employees must act as facilitators of the professional development of their collaborators, to promote their professional growth in the Company. They must also ensure that they promote respect for equality between men and women, removing any obstacles that may hinder it.

#### **3.3.6 Occupational Risk Prevention**

Startical promotes the development and implementation of a Safety Culture, based on knowledge, awareness and behavior. From this point of view, the prevention of occupational risks is conceived as a responsibility of all professionals, who must be proactive in ensuring their safety.

In the same way, Occupational Risk Prevention must be integrated in the hierarchical line of the whole structure and in all its activities and decisions.

### **3.4. Resource-related behaviors**

#### **3.4.1. Information management, truthfulness, and confidentiality**

Accuracy and confidentiality of information are basic aspects to be observed in the development of the activity.

Subject persons must be aware that truthfulness of information is crucial in all their actions, communicating appropriately and without ambiguous omissions both internally and externally.

Under no circumstances shall incorrect or inaccurate information be knowingly transmitted that could mislead the recipient and cause negative consequences to Startical's image or reputation.



Confidentiality covers all non-public internal Company information (strategies, plans, financial information, know-how, etc.). All professionals must internalize the sensitivity of the information they work with and avoid information leaks using personal means.

### **3.4.2. Protection of personal data**

Subject persons must respect and safeguard the personal and family privacy of professionals, customers, and other persons to whose data they have access because of the performance of their duties. Therefore, special care will be taken in the treatment of personal data stored and exchanged during their professional activity at Startical.

### **3.4.3. Use of assets and information technology**

Ethical and responsible use of computer equipment, including the office applications and tools installed on them, as well as the way of accessing the data network and its associated services, is crucial.

In the use of computer systems and information technologies, the subject persons concerned shall act in accordance with the principles of diligence and correctness and shall comply with internal security rules and procedures. All professionals must comply with the security measures and strictly comply with the rules of use and policies established for this purpose by Startical. Extreme care shall be taken in the classification of information, access to corporate information and user management.

The IT assets made available to professionals are owned by the company and serve the primary purpose of ensuring the provision of services by such users. For this reason, the IT assets will be used by users for strictly professional purposes, and therefore reserves the right to monitor the correct use of corporate electronic devices.

## **4. Compliance Committee**

### **4.1. Composition and Functioning of the Compliance Committee**

Startical has set up a Compliance Committee appointed by the Board of Directors of the Company, which is responsible, among other things, for keeping this Code of Ethics alive, ensuring its compliance, and carrying out any necessary updates.

### **4.2. Monitoring and Control of the Implementation of the Code of Ethics**

Startical is deeply committed to the statements made in this Code of Ethics and will therefore progressively adopt the measures deemed necessary from time to time to give effect to the set of values, principles and rules that comprise it, disseminating its contents among those to whom it is addressed and resolving any doubts that its application may raise.

The Compliance Committee is responsible for monitoring and controlling the applicability of this Code.

## **5. Whistleblower Channel**

The Company provides a Whistleblower Channel ([ethicscommittee@startical.com](mailto:ethicscommittee@startical.com)) as a confidential channel to report any concerns regarding the interpretation or application that may arise in relation

to this Code of Ethics and its development regulations, and also to compulsorily blow the whistle on any irregularities or infringements detected in relation thereto or any illicit behavior.

#### **6. Consequences of non-compliance with the Code of Ethics**

The violation or breach of any of the principles contained in the Code will be sanctioned in accordance with the disciplinary measures according to the system of offences and penalties set out in the applicable Collective Bargaining Agreement or, failing that, in the Workers' Statute or in the labour regulations in force, without prejudice to any other responsibilities that may arise from such conduct.

On the other hand, for violations by members of the Board of Directors and professionals who are linked to Startical by means of a senior management contract, the provisions of their specific regulations and/or the provisions of their contracts shall apply.

Against other third parties within the scope of the Code of Ethics, Startical may terminate the existing relationship with them because of the infringement, all in accordance with the law in force at all times.

#### **7. Communication and training**

The content of the Code of Ethics is communicated appropriately in order to inform about both its existence and mandatory compliance and is subject to the corresponding periodic communication and training actions.

**ANNEX I: DECLARATION OF COMMITMENT WITH THE CODE OF ETHICS**

☐ I have received, read and understood the Code of Ethics of Startical.

Likewise, I undertake to behave in accordance with the policies, practices and standards established therein and I will inform about the knowledge or suspicion of any breach of the provisions of the Code of Ethics through the email established for this purpose (ethicscommittee@startical.com).

☐ YES ☐ NO

Based on the provisions of the same, I also undertake to reject any form of incompliance in my functions. ☐ YES ☐ NO

I am aware that in the event of any conduct that contravenes these policies in accordance with the principle of zero tolerance that Startical has towards any form of illegal activity, the Company will avoid or cease any type of relationship with the third party in question and will take, where appropriate, the pertinent disciplinary actions against the employee who breaches the Code of Ethics.

Name and position:

Contact:

Phone:

Email:

☐ He recibido, leído y comprendido el Código de Conducta de Startical.

Asimismo, me comprometo a comportarme de acuerdo con las políticas, prácticas y normas establecidas en la misma e informaré sobre el conocimiento o sospecha de cualquier incumplimiento de lo dispuesto en dichas Políticas a través del correo electrónico establecido para ello (ethicscommittee@startical.com).

☐ SÍ ☐ NO

En base a lo establecido en las mismas, me comprometo también a rechazar cualquier forma de incumplimiento en mis funciones. ☐ SÍ ☐ NO

Soy consciente de que ante cualquier conducta que contravenga estas políticas de acuerdo con el principio de tolerancia cero que Startical tiene hacia cualquier forma de actividad ilegal, la Compañía evitará o cesará cualquier tipo de relación con el tercero en cuestión y tomará, en su caso, las medidas disciplinarias pertinentes contra el empleado que incumpla el Código de Conducta.

Firma: Fecha:

Nombre y cargo:

Datos de contacto:

Teléfono:

Correo electrónico: