



Regulatory Compliance (Compliance)

Code of Ethics and Conduct of MINDED FACTORY

This is the Regulatory Compliance (Compliance) of the production company MINDED FACTORY.
Approved by the Management in June 2017, revised and updated in January 2020.

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1. Objective and scope

Minded Factory has vast experience as a creative producer. Since 2008 it has evolved into being an important company in the sector; independent, consolidated and committed to the creation of value, continuous improvement and solvency in its productions, respecting the principles and values that govern its actions.

These principles and values are included in this Code of Ethics and Conduct. The purpose of the Code is to collect, systematize and make public the guidelines to be followed by those who are related to the production company.

The purpose of this Code of Ethics and Conduct is to establish general guidelines for the conduct of Minded Factory, its directors, advisors, collaborators and employees in the performance of their duties and in their professional relationships, acting in accordance with laws and respecting ethical principles.

For the purposes of this Code of Ethics and Conduct and its development regulations, MINDED FACTORY and its economic interest groupings have their principal domicile in Spanish territory.

This Code of Ethics and Conduct applies to the directors and employees of Minded Factory, regardless of their position and level, as well as to the network of collaborators that relate to the production company.

2. Message from the Founder

The proper management of a production company such as Minded Factory requires establishing mechanisms that not only achieve the objectives that are typical of its main activity, but also that the system used for it is fully respectful of good business practices.

In this sense, integrity and respect for ethical standards in the development of the activity of audiovisual, social and business production, as well as the observation and obedience to internal laws and policies, are fundamental values of the producer and, as such, must also be of all of its staff. Failure to comply with our obligation to respect these values and norms could expose us to legal consequences and a loss of our reputation and credibility.

But complying with the rules and our internal policies should not be limited to maintaining a risk-free and good appearance. It also consists in acting as constructive participants in the society in which we act, developing and transferring the values we promote to present and future generations. In turn, it is about winning and maintaining the trust of our partners, collaborators, customers, suppliers, institutions and all those with whom the production company operates on a daily basis.

Minded Factory that operates internationally, is committed to the requirements of the board, directors, collaborators, staff and, where appropriate, to all those who regularly interact with the production company through commercial links or any other type of links. It is also committed to the obedience and follow-up of the ethical values and internal norms that are inherent to the nature of the company and to the principles that inspire it, creativity and team work, with a clear purpose of continuous improvement and long-term project to improve audiovisual production and its quality.

This Code of Ethics and Conduct brings together the main values and principles that inspire and motivate Minded Factory and all those that represent it or operate in its name.

David Barrera, Founder and CEO of Minded Factory

3. Message from the Compliance Officer

Our Code of Ethics and Conduct reflects the expectations of Minded Factory regarding the behaviors that should preside over any activity of the production company. We present it as a useful management tool, both internal and external, and as a guide for issues that may arise on a daily basis in the execution of our responsibilities.

Compliance with the principles and standards of action developed in the different internal policies of the company depends on the commitment and behavior of all those who work at Minded Factory in any situation.

Consequently, all Minded Factory personnel should read this Code, as well as the policies that are derived from it, and act in accordance with its content and observations.

Obviously, these documents cannot include all the situations and possible conflicts that may occur in the daily work of the production company. Therefore, in case of doubt, it is necessary for any employee to seek advice from their superior, or to raise the issue and consult with the Compliance Officer of the production company as follows.

We will devote our efforts to raising awareness about the importance of ethical conduct by developing a range of resources, such as this Code, that will ensure that all members receive appropriate training and incorporate these ethical behaviors into their daily activities.

Legacy by Guillén Associates, Legal & Compliance of Minded Factory

4. Our values and attitude

The ethical values that serve as a reference and that constitute the basic conduct guide for Minded Factory personnel and their branches are the following:

INTEGRITY and HONESTY: Minded Factory complies with legal regulations and professional ethics principles. All (the actions of the producer) our actions will be carried out in accordance with the principle of honesty and integrity. Corruption will not be tolerated, implementing the necessary measures to fight against the same. The well-being of the co-workers and the environment in which we operate is everyone's responsibility and it is everyone's duty to act in accordance with the commitments made.

IMPARTIALITY: Minded Factory will treat the people with whom it relates professionally respectfully and avoid all types of discrimination based on birth, gender, religion, opinions or any other personal or social situation. It will also guarantee the respect for human rights recognized in the Universal Declaration of Human Rights.

RESPONSIBILITY: At Minded Factory we meet our challenges taking into account the global impact of our decisions and actions.

TRANSPARENCY and CONFIDENTIALITY: At Minded Factory we work under the maxim that all our actions can be reported in a truthful, clear and verifiable way. We see information as an asset that we share to generate value. Minded Factory is committed to ensuring that the information disseminated is truthful and transparent, respecting people's privacy and confidentiality.

RESPECT: In Minded Factory we enhance personal, cordial and correct interrelations, with the utmost observation of respect as a fundamental pillar of democratic life and the ability to live in society, and also as the main emblem in the attitude of all our employees.

EFFORT: The culture of effort through dedication, rigor, the capacity for sacrifice and perseverance grant the professional successes that Minded Factory has gained and will surely gain in the future.

PROFESSIONALITY: Minded Factory is characterized by professional seriousness, diligence, dedication to service, and quality of its audiovisual production products, respecting the applicable regulations.

TEAM WORK: At Minded Factory we advocate teamwork as a method to enhance the optimization of all our resources and values.

AMBITION: Ambition is the will to achieve maximum performance and to do things not only well, but as well as possible, and try to overcome oneself each day. It is a value that is as applicable to the individual as to the groups.

HUMILITY: Minded Factory has earned respect by being humble - and by acting with effort, rigor and responsibility - maintaining and defending all our values, also in situations of success.

SOCIAL RESPONSIBILITY: Minded Factory is committed to best corporate governance practices and to contributing to social and economic development, respecting human rights and the environment.

All the previous values and principles of action of the production company are reflected in this Code of Ethics and Conduct and the regulations that develop it, and are equally applicable to all obliged subjects.

These values constitute the reference that should inspire the basic conduct of the Minded Factory personnel, and the people who usually interact with the production company through commercial or other links. Everyone should fulfill their respective responsibilities in accordance with the principles of loyalty to the company, good faith, integrity and respect for legal and ethical criteria. These values define a series of behaviors that must be observed by all personnel and associates in their professional practice, regardless of their geographical location, activity area or professional level.

Consequently, the Code of Ethics and Conduct facilitates the knowledge and application of the business culture of Minded Factory, firmly based on the fulfillment of human and social rights and the effective integration of personnel in the company, regarding its diversity.

This document establishes the principle of due diligence for the prevention, detection and eradication of irregular behaviors, including the analysis of risks, the definition of responsibilities, the training of the production staff and of the people associated with it. It also includes the formalization of the procedure, especially for the notification and immediate elimination of any irregular behaviors that may occur.

This standard highlights the firm commitment that Minded Factory has made for good corporate governance, transparency and social responsibility.

5. Scope and Terminology

The Code of Ethics and Conduct is applicable to Minded Factory and to all the territories in which the production company operates, and where it has or may have representation.

The Code of Ethics and Conduct has as its first recipients the employees and staff of the production company, its branches and, by extension, any person who regularly interacts with Minded Factory through commercial or other links. It also applies to board members, associates, and departments of the production company.

All recipients of the Code of Ethics and Conduct will be responsible for knowing, complying with and enforcing the laws, policies and procedures that apply to them, in accordance with their professional function, responsibility and workplace.

5.1 Staff

It refers to all the people who work in Minded Factory, including the professionals of the production company, the executive staff and the management, as well as the salaried workers of the production company, including the temporary workers and those who provide their services through companies of temporary work (ETT).

5.2 Associates

Associates are those natural or legal persons that, being independent of the production company, usually interact with Minded Factory through commercial links. Including, but not limited to, the freelancers or companies with which Minded Factory maintains business relationships of any kind, including, among others, relationships with natural or legal persons hired commercially by the production company for the delivery of goods or service provision.

5.3 Policy and guidelines

Internal rules of the production company that establish parameters of conduct approved by the management of Minded Factory and mandatory compliance by its recipients.

5.4 Procedure

Set of steps or actions to follow and which are grouped together in a specific process, in order to execute what is established by both the applicable legislation and the internal policies of Minded Factory.

5.5 Required subjects

The staff of Minded Factory and the people associated with the production company described in the previous sections.

5.6 Purpose and aspiration

All Minded Factory personnel, as well as people associated with the production company, have the following obligations:

- a. To know and comply with the laws, regulations and internal rules applicable to the functions assigned to them.
- b. Know and comply with the commitments and behavior guidelines set forth in this Code of Ethics and Conduct.
- c. Promote among the people associated with Minded Factory the observation and compliance with this standard and, where appropriate, promote the adoption of behavior patterns consistent with it.
- d. In case of doubt, ask the superiors or the Compliance Officer for help.
- e. To inform, through the means and channels that Minded Factory establishes, the breaches or violations of the guidelines of conduct included in this norm that come to its knowledge.
- f. Collaborate in the operation of the internal control systems of Minded Factory and in the development of audits that may be performed to identify and correct deficiencies or weaknesses in internal control systems.
- g. Ensure that people under their responsibility know, understand and comply with this rule.
- h. To opt for a behavior that represents a model that follows each and every one of the people of Minded Factory or the people associated with the producer.

6. Commitments of conduct and responsible practices

6.1 General principles

The activities carried out by the staff and associated persons shall be subject to the general principles set forth below:

a. They must exercise their activity in accordance with the national and international regulations in force, the guidelines of conduct contained in this Code of Ethics and Conduct and, where appropriate, the ethical standards that their college or professional association has established for that purpose, taking into consideration the legitimate interests of Minded Factory and its own personal convictions.

b. The actions of all personnel and associated persons will be based on legality, honesty, professional service to the project and to the client, loyalty, diligence, responsibility and transparency.

Compliance with legality and continuous adaptation to applicable regulations
Minded Factory assumes the commitment to develop all its activities in accordance with the legislation in force in all areas of activity, and in all the countries in which it operates, so that the staff and people associated with the production company will strictly comply with the current legality attending to the spirit and purpose of laws and regulations.

Consequently, all activities carried out by Minded Factory personnel must comply with the provisions of civil, commercial, criminal, administrative and labor laws and regulations, rejecting corruption and any illegal practice and adopting the maximum effort and commitment in the defense and promotion of the quality of audio-visual productions.

Likewise, the staff and the persons associated with the production company will fully respect the obligations and commitments assumed by Minded Factory in its contractual relations with third parties, as well as the good practices of the countries in which it carries out its activity.

Those bound by this rule will not collaborate with third parties in the violation of any law, or in actions that, despite being legal, may compromise respect for the principle of legality, damage the reputation of Minded Factory or impair its perception among its clients and associates, the audio-visual production sector, the institutions or the other concurrent stakeholders.

Honesty

The personnel and people associated with Minded Factory must act at all times in an honest, efficient manner and for the benefit of the interests of the production company.

Loyalty

The personnel and people associated with Minded Factory must carry out their activity with integrity and loyalty to the producer, so that their actions, both in the field of management and representation, should never interfere in the interests of the entity or harm them.

Diligence and responsibility

In the relationship with customers and third parties Minded Factory considers it crucial that the activities of the staff of the production company and the associated persons are carried out with the highest quality standards required. The staff and the associated persons must act at all times with the utmost diligence, responsibility and professionalism, always using the right tools and time for it, and assuming, depending on their category and professional responsibility, any responsibility inherent in their actions or omissions.

Transparency

The production company, as well as the personnel that represents it, must at all times maintain the commitment to offer a wide, truthful, complete, clear and precise information of its activities to clients and other entities, natural or legal persons linked to the production company that demands it, with clear manifestation of the principle of transparency in the decision-making processes.

6.2 Human Rights

In addition to complying with the applicable legislation in force, Minded Factory undertakes to respect internationally recognized human rights, which encompass the rights set forth in the International Human Rights Charter and the principles relating to the rights established in the Declaration of the International Labor Organization.

In order to identify, prevent, mitigate and respond to potential abuses, Minded Factory will carry out a continuous due diligence process in its own activities and in activities with which they are directly related to in its operations, products or services provided within the framework of its professional relationships.

Consequently, all subjects bound by this Code, in their capacity as members of Minded Factory, must continue this commitment, exercising their professional activities with full respect and guarantee of human rights and public liberties.

The relations with Minded Factory personnel must be based on mutual respect, fostering a comfortable, healthy and safe work environment, refraining from using any aggravating behavior, or involving any kind of discrimination based on race, religious ideas, political views, union, nationality, language, gender, marital status, social status, age, disability or sexual orientation.

6.3 Professional development and equal opportunities

The professional growth of the employees of the production company is closely linked to the integral development of each person. For this reason, Minded Factory promotes initiatives of different nature and puts the necessary and adequate means to contribute to the learning and development of its employees and fosters an environment in which equal employment opportunities reach each and every one of its members, ensuring Non-discrimination

The selection, hiring and professional career of Minded Factory staff are based on the merits, capabilities and performance of the professional functions of each employee.

Minded Factory is also aware of the importance of promoting a proper balance between professional and personal life. The company is committed to promoting measures and programs that help employees achieve a balance between the two.

6.4 Cooperation and dedication

Minded Factory promotes an environment of cooperation and teamwork for a better use of all capacities and resources. All the staff of the production company must act in a spirit of collaboration, making available to the rest of the competent staff the knowledge and resources that can facilitate the achievement of the objectives and interests of the company.

The Minded Factory staff must work efficiently during the workday, making full use of the time and resources that the company makes available to them, and trying to provide maximum value in all their actions.

6.5 Unjustified expenses, gifts and attention

Unjustified expenses, gifts or attentions given to third parties by Minded Factory personnel may conflict with the prohibition, provided for both in current criminal legislation and by good national and international practices of carrying out acts of corruption with individuals or with public officials.

Due to the above, and although both giving and receiving care in good faith and based on strict cordiality and personal kindness can be part of the ordinary business environment of any entity, criteria must be established in relation to its reasonableness and proportionality.

It is strictly prohibited to incur in any unjustified expense, gift or attention that exceeds ordinary business practice destined to maintain long-lasting and solid business relations. In other words any gifts that have a disproportionate value with respect to the lawful purpose pursued and that have bribery as their object, or pretends that recipient adopts an unequal decision, or breaches the commitments made with other entities, which would affect their impartiality and good judgment, are prohibited.

In the event that the personnel and / or persons associated with Minded Factory have offered, promised, made available, requested and / or accepted any gift or unjustified attention, or if they were aware of it, they should immediately contact the Compliance Officer, who will determine how to proceed.

6.6 Conflicts of interest

These appear when the interests of Minded Factory personnel, either directly or indirectly, are contrary or collide with the interests of another person or entity, interfering with the fulfillment of professional duties and responsibilities, or involve them in personal title in any transaction or economic operation.

In this regard, although Minded Factory recognizes and respects the participation of personnel in financial and business activities other than those developed by the entity, provided that they are legal, ethical and do not collide with their responsibilities to the producer, the latter should avoid at all times those situations that may imply a conflict between his/her personal interests and those of the company, or that allow them to use their position in Minded Factory to obtain personal or economic advantages, or business opportunities.

In the event that Minded Factory personnel are in a situation that may generate a conflict of interest or may compromise their necessary objectivity or professionalism, they should immediately contact the Compliance Officer for indications on how to proceed.

6.7 Good tax practices.

Tax Risk Prevention

The ordinary and extraordinary activity of Minded Factory entails the adoption of a set of decisions that have repercussions and implications in the field of tax law. Therefore, the producer intends to comply with its tax obligations in all territories and jurisdictions in which it develops its ordinary and extraordinary activity, always opting for a prudent tax policy.

Relationship with tax authorities

Minded Factory personnel must provide information and documentation with fiscal significance requested by the tax administrations in the shortest possible time, and with the necessary scope. If a disparity of interpretative criteria arises, Minded Factory personnel must discuss these adequately with the tax administration body to find out what best suits the operation proposed, in order to agree on the ideal path for the correct resolution.

6.8 Performances of people associated with Minded Factory

Minded Factory can be held liable for all actions performed by employees, associates and third parties, when they act according to the producer's instructions. To guarantee a transparent and ethical management of the actions carried out by the people associated with Minded Factory, it will be mandatory: (i) to formalize in writing and document the decision-making process; (ii) subject the persons associated with the producer to the previous controls that are appropriate; (iii) offer remuneration subject to market values; (iv) not offer or make payments in cash or transfers to accounts where the holder is not known; to accounts whose owner is different from the service provider, or to accounts that are located in territories classified as tax havens; and (v) not accept bribery or validate any inappropriate behavior by people associated with Minded Factory.

6.9 Relations with society

Employee Relations

Minded Factory staff is crucial for the business development of the production company. In order to protect its staff, Minded Factory defends and promotes the fulfillment of human and labor rights, guaranteeing a high standard in terms of employment conditions and health and safety in the workplace, under the principles and ethical values indicated in this Code.

Minded Factory personnel must strictly comply with applicable labor standards and collaborate in the prevention, detection and eradication of irregularities in this area. Consequently, all personnel are obliged to act, in their professional relations with other employees, in accordance with the criteria of respect, dignity and justice, taking into account the different cultural sensitivity of each person. No form of violence, harassment or abuse at work is allowed. Nor do we allow discrimination based on race, religion, age, nationality, gender, social status or any other personal or social condition outside the conditions of merit and ability, with special consideration towards care and labor integration of people with disabilities.

The staff will be responsible for rigorously complying with health and safety regulations at work, and for ensuring their own safety and that of those affected by their activities.

The use of substances that may affect due compliance with professional obligations, as well as any conduct of sexual harassment, abuse of authority, offense, defamation or other form of aggressiveness and hostility that fosters a climate of intimidation is strictly prohibited.

Customer relations

The production company understands that success in its activity also depends on its ability to maintain long-term business relationships. In this sense, it is the commitment of Minded Factory to offer a quality of services equal to, or greater than, the requirements and quality standards established by law.

The Minded Factory staff must act in an integral manner with the clients of the production company, with the objective of achieving the highest levels of quality, excellence in service provision and the long-term development of relationships based on honesty, trust and mutual respect. For this, the production staff is required to comply with the following:

- a. The information provided to the clients in relation to the services provided by Minded Factory must be truthful and complete.
- b. Gifts and attention may not exceed those derived from ordinary business practice, aimed at maintaining lasting and solid business relationships. The staff of the production company may not offer attention to customers with the purpose of bribery or pretend that the recipient receives an unequal decision or breaches the commitments made with other entities, thus affecting their impartiality and good judgment.

Relations with suppliers

Minded Factory will operate objectively and impartially in the supplier selection processes, therefore the staff of the production company must apply the criteria of quality, cost, service and reputation in these procedures, avoiding any conflict of interest or favoritism in their selection.

Specifically, Minded Factory personnel may not accept or request any personal benefit from a supplier, or potential supplier, which purpose compromises, or may compromise, its impartiality and objectivity.

However, Minded Factory personnel may give or accept promotional items of marginal value or those whose delivery occurs within normal business practices, aimed at maintaining long-lasting and solid business relationships, and provided that they do not compromise their impartiality and good judgment in any way.

Minded Factory will promote among its suppliers, associates and other collaborating companies knowledge of the Internal Code of Ethics and Conduct, as well as the adoption of consistent behavior guidelines.

Relations with governments and authorities

Minded Factory will not finance, directly or indirectly, either in Spain or abroad, political parties or their representatives or candidates. Relations with the authorities, regulatory bodies and public administrations will always be raised under the principles of cooperation and transparency.

6.10 Reserved and confidential information

Minded Factory understands that information is one of its main assets, essential for the management of its activities. In this sense, it is the producer's commitment to preserve its integrity, availability and confidentiality and, thus, minimize the risks arising from its disclosure and misuse.

Consequently, Minded Factory personnel and, in certain cases, the associated persons, must maintain the reservation and confidentiality of the information owned by Minded Factory and the persons associated with the production company or guarded by them who do not have the qualification of public, and to which they have access as a result of the performance of their professional activity.

Likewise, staff and associated persons should not make fraudulent use of this information, whether they obtain a profit or benefit or not.

Revealing, disseminating and using confidential and confidential information for uses or purposes other than those of professional performance constitutes a lack of loyalty to Minded Factory, both when done without proper authorization and, especially, when it is done in particular interest.

6.11 Economic and financial information

Having truthful, complete, accurate and reliable economic, financial and accounting information is essential for the correct business development of Minded Factory, so that all operations with economic significance carried out by the production company will appear clearly and accurately in appropriate accounting records that represent the faithful image of the transactions made and will be available to internal and external auditors. This information refers, among others, to accounting and financial records, payrolls, expense and travel reports, e-mails, computer and electronic files, as well as any type of information related to the ordinary course of business development of the Producer.

Consequently, Minded Factory personnel will introduce the financial information into the production systems of the production company in a complete, clear and precise manner, so that they reflect, on the corresponding date, their rights and obligations in accordance with the applicable regulations.

6.12 Corporate image and reputation

Minded Factory considers its image and reputation as one of its main assets to preserve the trust of its customers and collaborators.

In this regard, Minded Factory staff must take great care to preserve the image and reputation of the company in each and every one of its professional activities. Equally, they will ensure the respect and correct use of the image and reputation of Minded Factory.

Minded Factory staff must be equally careful in any public intervention in which they participate, they will inform their superiors in advance when they have to intervene, as representatives of the production company, before the media, in social networks or in any other type of act in which there are indications that they can reach a certain diffusion and public repercussion.

In addition, the personnel and people associated with Minded Factory must act in an ethical, respectful manner and in accordance with current legislation, even outside the working day and when they do not represent the company, in order to avoid possible impairments in the image and the reputation of Minded Factory.

6.13 Protection of personal data

Minded Factory ensures the right to privacy, protecting the personal data entrusted by its customers, staff, associates and institutions. The personnel and people associated with Minded Factory will not disclose personal data obtained in the exercise of their professional activities. Thus, in accordance with applicable laws, the privacy and trust placed in the production company is ensured. The production company, the employees and the people who are associated will observe the rules of protection of personal data established by international laws and conventions and, for this purpose, they will not collect, process, store, keep, communicate or use personal data in any way that contravene the mentioned norms.

6.14 Use of computer tools

Minded Factory employees are aware that the resources and computer tools that are made available to them by the company are only means provided by Minded Factory for the staff to develop an activity on its behalf, exercise his/her duties, in order to develop the business of Minded Factory. The use of the material and tools provided to the staff by the production company will be limited to the purpose of compliance with labor or professional benefits for Minded Factory, having to use them in a manner appropriate to their nature, as well as enabling an improvement in the network of communications.

Minded Factory reserves the right to carry out checks on the systems, equipment and computers or communication tools used by its personnel, subject to the applicable legal regulations.

The documents, programs and computer files are the property of Minded Factory and constitute one of the major assets of the production company, so appropriate precautions must be taken to avoid any risk of loss, destruction, use or unauthorized modification of these.

7. Specific commitments of senior management staff

Senior management members are subject to specific supervision and management commitments, making their decisions in strict compliance with the principles of relevance and timelines.

The aim to be pursued must be achieving the main objectives of the activity of the production company, acting with practices and behaviors that dignify the producer, its image and the values it represents.

In application of the above criteria, the performance of the executive personnel will adjust to the principles established in the general principles presented above and that are based on legality, honesty and customer service, loyalty, diligence, responsibility and transparency.

The following practices are considered contrary to the previous principles and values.

- To incur in a conflict of interest. If doing so, the one affected must reveal it by refraining from the decision-making process.
- To exert influence on others to reach a decision for their own benefit.
- Managers may not intervene in a different management area than the one assigned to them without the mandatory authorization of their manager.
- Hire external services without complying with the principles of need, relevance and opportunity.
- Accept gifts, advantages or dispositions free of charge beyond those that may be admitted for social uses. Nor can gifts be offered to third parties other than those authorized.
- Make the production company incur in disproportionate, sumptuous and unjustified expenses.
- Receive commissions or any compensation.
- Pay commissions that exceed or are outside those that correspond to authorized professionals.

- Prevail their position in the production company to obtain benefits in the personal or professional field when these benefits are detrimental to the company.
- Not respecting the rules of confidentiality of the deliberations carried out in the decision-making processes.
- Starring events or public and even private actions that threaten the good image and prestige of Minded Factory.
- Use goods and assets of the producer for its own benefit.
- Discrimination or inappropriate treatment based on gender, race, color, nationality, belief, religion, political opinion, state, sexual orientation, disability or any other personal circumstance protected by law, both in terms of employees, managers, associates or suppliers.
- The Code of Ethics and Conduct not only compromises what is expressly provided, but also all the consequences that in accordance with good faith derive from its content.

8. Regulatory and Ethical Compliance Channel

8.1 Communication of doubts and incidents

In case of doubts regarding the interpretative criteria of the mentioned Code, or about the application of its content in certain cases, the Compliance Officer should be consulted without delay, through the email compliance@mindedfactory.com.

Likewise, personnel and persons associated with Minded Factory will have the right and obligation to report any inappropriate conduct or breach of the provisions of the Code of Ethics and Conduct, including any violation of laws, rules, regulations or policies that result from application in the production company, through the Regulatory and Ethical Compliance Channel enabled by Minded Factory for that purpose.

Thus, in the event of knowing or suspecting any violation of this Code, you must choose to report this incident, reporting to your superior (when applicable), who should go directly to the Compliance Officer through the Regulatory and Ethical Compliance Channel.

Minded Factory will process any communications and, as far as possible, must guarantee the confidentiality of the complaint and the indemnity of the complainant in good faith.

8.2 Penalty system

No one obligated to comply with this norm, regardless of their level or position within Minded Factory, is authorized to request another person from the production company or an associated person to contravene the provisions of the same. In the same way, no one obliged to comply with this norm can justify inappropriate conduct by relying on an order from their superiors or by ignoring this Code.

Breaches of this rule will eventually be analyzed and, where appropriate, sanctioned by the company in accordance with applicable regulations, current collective agreements and internal procedures. Likewise, the producer will inform the relevant authorities of the regulatory breach if there could be indications of crime.

The Compliance Officer will coordinate:

a. With the Department of Human Resources and the Company Committee, where appropriate, those actions that may be necessary in relation to the personnel of Minded Factory.

b. With the Legal Department of Minded Factory, those actions that are applicable to people associated with the production company by commercial or other relationship. In any case, the measures adopted will be limited to the principle of proportionality, and the affected party will be given a hearing, so that he can give a reason for the incident, in accordance with the described process of prevention and response to crimes of the company.

8.3 Monitoring

The Compliance Officer will keep an updated record of the breaches that come to his knowledge, as well as the actions taken against them, in accordance with the provisions of the preceding paragraph.

In the event that, after the corresponding complaint and investigation, it is detected that the breach of the provisions contained herein has been the result of a defect in the procedures or controls implemented by Minded Factory, it will be reviewed and updated in order to avoid it from happening in the future.

9. Dissemination and training

It is the responsibility of the Legal & Compliance Department to deliver this Code of Ethics and Conduct to employees and associates of Minded Factory, which will be included, in case of new hires, to the corresponding Welcome Pack, with the rest of the Entity's internal regulations (as it has been decided).

In the case of the persons associated with the production company, it will be the function of the contacted person to ensure and document that these associated persons know both the Code of Ethics and Conduct and the different Minded Factory policies referred to in this document, being aligned and respecting the content of these texts.

Likewise, the Compliance Officer will also ensure that personnel and associated persons have access to this Code, as well as respective policies and other internal rules of mandatory observation and compliance, and will promote the measures deemed necessary for their content to be easily accessible, and will answer any questions that staff and people associated with Minded Factory may ask about its content and scope.

It is the responsibility of the Legal & Compliance Department of Minded Factory to promote recurrent training among personnel that refer to this Code and in the norms and guidelines of ethical conduct adopted by the production company, ensuring that they all take advantage of the appropriate courses.

10. Approval

The updated version of this Code of Ethics and Conduct is applicable after approval by the Management on December 12th, 2019, and its compliance is mandatory for all employees and persons associated with MINDED FACTORY from the moment it has been communicated to them.

