

Introduction

This Code of Conduct outlines a series of regulations and general principles of corporate governance and personal conduct applicable to all members of INCATUK which are valid to set the parameters governing the corporate culture of the Company.

The Code of Conduct is a key element to create a climate of compliance and respect of the code of conduct and ethical principles of INCATUK by Members. Therefore it is necessary that it does not only outline the general principles but also that it incorporates the principles which may be useful for the Company to mitigate criminal risks.

The priority objective of INCATUK is to build up trust and create value in the development of its activity both in the national and international market for the benefit of its clients, of competition and of the development of countries where it operates and of expectations of all members of the Company.

Therefore, the Company aims at building up a relationship of trust both at a national and international level where it develops its activity with all social and economic agents with which it relates, i.e., with those Company categories, institutions or people whose contribution is essential to accomplish the goals of INCATUK.

Recipients

The recipients of this Code of Conduct are the members of the Shareholders Meeting, the Members of the Board of Directors, the Members of the Management of the Company as well as those responsible for the different departments and delegations and other employees (hereinafter, the “**Recipients**” or “**Members**”).

INCATUK shall promote, within its possibilities, the adoption by the main suppliers and external collaborators with which it relates, a conduct that complies with the ethical principles of the present Code of Conduct.

This Code of Conduct shall be valid both in Spain and abroad bearing in mind the cultural, linguistic, social, economic and legal differences of the regions where the Company develops its activity.

Mechanisms for its implementation

There are control systems to assess compliance and corporate implementation of this Code of Conduct and of all ethical principles and behavioural criteria included in this Code of Conduct. The Company shall make this Code of Conduct available to all Recipients and shall monitor its compliance through the compliance assessments of the Program.

Grounds of the Code of Conduct

The Code of Conduct has been prepared on the grounds of the corporate principles and values of INCATUK. In particular, it is developed based on:

- a) Ethical principles: They shall govern any behaviour or commercial action of INCATUK in general with respect to all economic and social agents with whom it normally relates in its daily activities and with whom it pretends to build up trust.
- b) Behavioural Criteria of Recipients: With respect to each type of economic and social agents with whom it relates within the framework of the corporate activity of the Company,
i.e. clients, suppliers, employees, social agents, public bodies, competitors and supranational bodies.

Below, we provide for the ethical principles that shall govern the conduct of the Members of the Company:

- Compliance with the Law and Human Rights:

The Members of INCATUK shall at all times strictly respect the legal framework in force in all territories where the Company develops its commercial activities including any regulation which may be applicable in the different countries, regions, states and municipalities.

Pursuant to the wording above, all actions of INCATUK and of its Members shall ensure scrupulous respect of the regulatory compliance applicable to each situation, to human rights and to public freedoms. Therefore, they shall apply all necessary measures to guarantee the respect of fundamental rights, the principles of equal treatment and non-discrimination, protection against exploitative child labour and any other principle considered in the Universal Declaration of Human Rights and the United Nations Covenant on Human Rights, labour rights, environment and fight against corruption.

Within the scope of the corporate and commercial activity of INCATUK, any entity or person who collaborates or relates with it, shall diligently respect the actual legal system in force, the Code of Conduct and the internal regulations of the Company.

- Quality and excellence.

INCATUK directs its own activity to satisfy and defend its own clients, attending all requests that can favour the improvement of the quality of services provided.

In this sense, the Company directs its research, development, installation and maintenance technical activities to attain excellent quality standards of its services.

- Reputation and prestige of INCATUK.

As a consequence of the broad experience of the Company in its sector and of having a human team solvent, loyal and committed to the values of the Company and its *knowhow*, INCATUK has solid reputation in its sector.

All Members of INCATUK assumes the commitment to take part in the duty to strengthen the prestige and reputation of the Company.

- Commitment, efficiency and professional development.

The Company favours a work environment where employees/professionals participate in the strategic objectives of the company and can develop both personally and professionally. Therefore:

- In order to attain commitment and involvement of all Members of the project, they shall be informed and aware of the general objectives of the company and if applicable, the features involved.
- All Recipients have to be dedicated and act efficiently, streamlining their working hours which will contribute to their professional and personal growth.
- All Members shall be personally involved in their professional development increasing their skills and knowledge in their professional duties.

- Protection and promotion of human resources.

All Members of INCATUK are the main asset for the Company to fulfil the goals set in its commercial activity. As a consequence thereof, the Company promotes the professional development of its Members bearing in mind the potential balance between the objectives of the Company and the needs and expectations of its Members.

Moreover, INCATUK encourages constant adaptation and improvement of skills and capacities of the organization. Mainly, Labour Risk Prevention is a priority issue for the Company. Therefore, the Company is committed to the implementation of all necessary measures to eliminate or reduce labour risks of all Members that carry out their professional duties in the Company.

- Respect and commitment with the community and the environment.

Corporate Social Responsibility of INCATUK understood as its commitment to the company and the environment in the development of its activities and in the benefit of all its Companies of interest is inherent to its business model.

INCATUK is committed to the protection and respect of the environment and therefore it develops its activity under the premises of minimizing negative environmental impacts arising from its activity and preventing pollution, as well as respecting the environment. In this sense, the Company promotes research and innovation that improves the development of its activity; seeking also the training of Members whose duties and responsibilities are developed within such scope. In this sense, the Company shall encourage collaboration with the recipients of the code of conduct with organizations of social interest or with other activities developed with the organization or channelled through the collaboration with social organizations.

The main commitment of INCATUK is to the local, national and international community. This commitment materializes in the development and promotion of initiatives oriented to the improvement of the quality of life of people of the communities or regions where the activity is developed and its different projects.

The Members of the Company are committed with a proactive and participative performance consistent with the commitment of INCATUK to the community.

- Confidentiality and transparency.

Confidentiality is one of the most important assets of any society both towards the client and internally. Therefore, useful instruments will have to be implemented for the sake of protecting such information considered as confidential. To such end, this section will be aimed at (i) establishing the regulations to be followed by the Company with respect to the confidential information created and (ii) setting the guidelines to be followed by the professionals of INCATUK with respect to the protection of industrial and intellectual property rights.

Everything regarding confidential information applies to all Members of the Company regardless of its hierarchical position within the organization or its professional skills. Moreover, these Professionals shall use their best efforts to guarantee that the standards will be fulfilled both by other professionals (agents, suppliers, collaborators, etc.) and by contractors and subcontractors of the Company.

- Anti-bribery and corruption.

INCATUK has a zero tolerance policy regarding bribery and corruption. The Company totally rejects any conduct which could be understood as corrupt both between individuals and public officials, beyond legality and the uses and practices of the legal system.

Definition and development

Confidential information is defined as such information regarding the Company or any of its professionals which, in case of disclosure, could cause reasonable damages to the financial situation, strategic planning or reputation of INCATUK as well as privacy of its professionals.

In general all the information produced during the development of the activity of the Company by its professionals is confidential. In any case, the following information will always be confidential:

- The strategy of INCATUK;
- Know-how;
- The information of the professionals of the Company; and
- Non-public information of the organigram, shareholding structure, fees, audit, insurances or ongoing and finished legal procedures to which the Company has been a party.

This information is not the only one susceptible of being considered confidential being able to extend it and referring to a broader one.

Storage and disclosure

Confidential information may be both physical and electronic. The Company will have to determine also the specific place for its storage as well as the security measures to avoid its access by unauthorized people.

Confidential information shall not be saved in personal files of employees or in any other mean which has not been previously authorized by INCATUK (i.e. Dropbox, social media or personal emails).

With respect to the disclosure of such confidential information, it will be disclosed in the following circumstances:

- During the negotiation of commercial proposals with clients;

- When such information is required by certain professionals to carry out certain works;
- When required legitimately by professionals alien to the Company who may request it for the provisions of services (i.e. auditors, lawyers, consultants, etc.);
- When certain information has to be notified to suppliers of the Company;
- When required by some judicial or administrative authority; and
- In all those cases when it may be necessary for the ordinary development of the Company's activity.

In the event of disclosure of confidential information of the Company in accordance with the provisions above, the professional proceeding to such disclosure will make sure that the following requirements are fulfilled:

- To transmit confidential information to its recipient through means guaranteeing confidentiality.
- To inform the recipient of the information on the strictly confidential nature of such information and of the obligations to such end as provided for in section 7.
- To subscribe between the parties a confidentiality agreement.

On the other hand, the specific behavioural criteria with respect to each of the Companies or individuals with which the Company relates in its commercial and corporate activity included in this Code of Conduct are inspired and applied according to the strictest compliance with the legal system that will inform in any case of its application, being mainly oriented to the application of the Ethical Principles of the Company.

▪ Relations with clients

Honesty and professional liability

Any relation with the clients of the Company will involve the strongest commitment with honesty and professional responsibility and strictly comply with the regulations applicable to the relationship with its clients.

In this sense, the commitments acquired with clients will be respected informing them with due advance of any change, modification, alteration or variation of verbal and written agreements; promoting transparency of the Company's relations and revealing the integrity of all professional actions of INCATUK.

Contracts and promotional activity with clients

Contracts to be signed with the clients of the Company and regarding promotional activities will have to be:

- Clear and direct,
- Subject to the current legislation avoiding abusive or incorrect practices in any other manner; and
- Complete meaning that, clients shall have all the information regarding the decision making process and execution of contracts.

Confidentiality and privacy

As already mentioned, confidentiality is one of the most important assets of any company both for clients and internally.

In particular, in this section we will assess confidentiality with respect to clients. This is an essential part of the continuity of a commercial relationship because in case of disclosure of any detail of the client there will be consequences such as the termination of the commercial relationship and the subsequent bad reputation of the Company.

Parties involved:

Members have the duty to make a correct use and refrain from disclosing the confidential information of the Company. This obligation will have to be expressly included in employment contracts.

It is advised that all Recipients of the Code of Conduct of INCATUK, regardless of their salary or hierarchical position sign confidentiality agreements declaring that the information received, is confidential, that the necessary measures for its protection have been taken and that the signatory is obliged to fulfil these measures.

Moreover the necessary measures to guarantee the confidentiality obligation of collaborators regarding documents received with respect to the Company will also be imposed.

It will therefore be necessary to include specific confidentiality obligations for the recipients of the information. This obligation may be presented in letters, confidentiality agreements or notices. Such obligations will be clear and appropriate for the type of information which they may have access to and the purpose sought.

Professionals of INCATUK will guarantee that –before the delivery of confidential information consequence of a contractual relationship with the Company- Recipients have assumed their confidential information.

Conflicts of Interest

It shall be considered that there is a conflict of interest when there is a direct or indirect conflict of interests of the Company and the personal interests of any of the Members of INCATUK and of any of its relatives as defined in the previous paragraph.

Any type of relationship either economic, family, friendship or of any other nature of the Members of INCATUK with clients may involve an alteration of the independency in the decision-making process and may entail a potential risk of unfair action, resulting maybe in a conflict of personal and Company interests. Therefore, when such circumstance takes place, the Supervisory Body will have to be notified.

Therefore, the Members of the Company shall avoid situations which may represent a conflict between their personal interests and those of the company. They shall also refrain from representing it or appearing or influencing on the decision-making process in which they themselves or a third party related thereto have directly or indirectly, a personal interest. They may not use their position in the company to obtain patrimonial or personal advantages or business opportunities for themselves.

No Member of INCATUK may provide services as consultant, engineer, director, employee or advisor to another competing company except for the services that can be provided under request of the Company or with the previous authorization of the Company Management.

The Company respects the private life of its staff and accordingly the private sphere of its decisions. Within the framework of this policy of respect, Recipients are encouraged to inform the Supervisory Body of any potential personal conflict of interest or of its family environment which may jeopardize the necessary objectivity or professionalism of its duties in INCATUK to proceed, with respect to confidentiality and intimacy of people, to the adoption of the relevant measures for the benefit both of the Company and of people affected.

In particular, the following shall represent situations of potential conflict and shall be the object of notification to the Supervisory Body:

- The development by the Member or by people related thereto, directly or indirectly, by themselves or through any company or institution, of activities which represent the same, analogue or complementary type of activities developed by INCATUK.
- The development by the employee or people related thereto, directly or indirectly by themselves or through any company of institution, of activities leading to the exchange of goods and/or services with INCATUK, regardless of the system of remuneration agreed.

INCATUK shall not accept in general terms, behaviours which may jeopardize the independency of the Company or of its clients in the decision-making process.

Gifts, grants, handouts and favours. INCATUK shall not make or receive any sort of gift or grant that can be considered as beyond normal commercial practices or courtesy.

In particular, it is expressly forbidden any form of gift, grant, handout or favour to clients which may influence in the independency of the decision-making process by these last ones or aimed at guaranteeing any type of favour to INCATUK or its Members.

Extreme care shall be taken to avoid this type of conducts in international transactions in which the Company acts in view of the difficulty that can involve its control in other jurisdictions and markets different from the Spanish one and of the negative impact such conducts may have on the international reputation of the Company.

INCATUK shall refrain from practices forbidden by the applicable legislation, by commercial uses and by ethical or conduct codes, if known, of the institutions or public bodies and of entities with which it holds business relationships.

The feature of any gift of the Company is that its value shall only be symbolic and will be directed to promote the brand image of INCATUK.

Any gift offered with such purpose shall be managed and authorized pursuant to corporate protocols.

The breakdown of this section is included in the Policy on Gifts of INCATUK.

Management of claims

The Members of INCATUK responsible of projects or contact people with clients for the development of a project undertake to attend, respond, channel and if applicable, solve any claim of clients.

Business opportunities

No Member may use the name of INCATUK or refer to its professional category for the development of transactions in its own name or in the name of related parties.

In this sense, no Member may in its own benefit or of related parties, make investments or any other transaction related to the assets of INCATUK of which it may have been aware due to its duties, when the investment of the transaction was offered to the Company or the Company may have interests in it insofar as the Company has not rejected such investment or transaction such Member not having any influence on the decision.

- Relations with suppliers or collaborators

The relationship of INCATUK with suppliers

Due to the demanding challenges and the legal requirements of each region, the international market of the development of engineering and consultancy projects requires a collaborative behaviour between the Company and its suppliers. Therefore, product and services suppliers of INCATUK are considered as professionals or collaborators of the business worldwide.

For this reason, in order to fulfil the quality standards provided for by the Company, its relations with suppliers are subject to a strict quality control, compliance and excellence.

Company professionals will relate with suppliers in a legal and ethical manner.

The choice of suppliers will be governed by criteria of objectivity and transparency reconciling the interest of the company for the achievement of the best conditions with the convenience of maintaining stable social relations with ethical and responsible suppliers.

All suppliers who work with INCATUK shall undertake to respect human and employment rights of all employees as well as to involve and transmit these principles to its business partners. The breach of any of these principles shall never be acceptable by the Company.

The Members of INCATUK shall neither request suppliers nor accept information regarding conditions laid down by other companies competing with the Company.

Any gift or grant received contravening this Code of Conduct shall be immediately returned and notified to the Supervisory Body.

The relations of INCATUK with its suppliers shall always be executed in written contracts providing for a clear relationship and avoiding any kind of dependency.

Selection of suppliers and collaborators

Selection processes of suppliers and/or Company collaborators shall have as main feature the search of competitiveness and quality guaranteeing equal opportunities between all of them.

Heads of departments responsible of looking for suppliers and/or collaborators for the development of an activity should pass on to the Management of the Company at least three quotations from different suppliers and/or collaborators in order to decide on the most appropriate candidate for the activity.

Should the supplier and/or collaborator in the development of its own activity for INCATUK, adopt conducts non-compliant with the general principles of this Code of Conduct or contrary to the current legislation, the Company will be entitled to adopt the relevant measures and may refuse to collaborate in the future with such supplier.

Relation with commercial agents

Commercial agents represent an essential element of the commercial strategy of INCATUK. As for the case of suppliers and/or collaborators, the image projected by INCATUK to its clients is closely related to the professional performance of agents.

As a consequence, the Company will request all its agents to represent INCATUK in commercial, national or international transactions, the knowledge and strict fulfilment of the present Code of Conduct as well as the development of their activity with the greatest due diligence.

Independence

The decision on the purchase of assets or the contracting of services will at all levels be totally independent. Any relationship either economic, familiar or of any other nature shall take into consideration what has been previously established in section "conflict of interests".

Gifts, grants, handouts and favours

The provisions of this same section with respect to clients of INCATUK and in the Policy on Gifts will be applied.

Departments empowered to make purchases shall, if applicable, have greater care to avoid this type of practices.

In particular, any kind of gifts, grants or favours to suppliers which may influence on the independency of the decision-making process by the latter are forbidden or which may incite to guarantee any sort of favour to INCATUK or its Members.

In any case extreme care shall be taken to avoid this type of conducts in international transactions in which the Company may act regarding the difficulty which may represent it control in other jurisdictions or markets different from the Spanish one and for the negative impact that such conducts may have on the international reputation of the Company.

INCATUK shall refrain from practices forbidden by the applicable legislation, commercial uses or ethical or conduct codes, if known, of institutions or public bodies or with entities with which it has a business relationship.

- Use of goods and services

The Members of the Company shall efficiently use the goods and services of INCATUK and shall not make use of them in their own benefit.

To this end, the Recipients of INCATUK shall under no circumstance use the devices that INCATUK makes available to them to install or download programs, apps or contents which use is illegal, contrary to the standards of the company or which may damage its reputation. They shall neither make use of funds or cards of the company to pay for actions which are not related to their professional activity.

The Members shall know that the documents and data contained in the systems and IT devices of the Company may be subject to revision by the competent units of the Company or by third parties appointed by the former when so considered necessary and is allowed by the legislation in force.

- Relationship with competitors

The relationship of INCATUK with competitors

As a consequence of the market where INCATUK develops its commercial activity, the Company shall compete with the same companies in different regions so they are known in the sector, in order to be awarded tenders and contracts of projects.

Relationships with competitors shall always respect the current legislation on competition.

The Members of INCATUK shall refrain at all times from disseminating any type of false information or rumours regarding competitors.

- Human resources

Recruitment of staff and professional promotion

INCATUK avoids any form of discrimination with respect to its Members in the development of functions and career within the organigram of each of the companies of the Company.

In the processes for the management and development of people as well as in the processes for the selection and professional promotion, decisions made are based on the adaptation of profiles of professionals to the duties to be developed in the position held and in considerations related to merits.

The access to duties and positions is provided for taking into consideration the skills and capacities of candidates.

Training

INCATUK makes available to all Members the information and training tools in order to improve their specific skills and develop the professional value of people.

Training responds to the needs objectively set by the Company and takes into account the professional development of people.

In this sense, INCATUK undertakes to provide the training considered necessary for the Members of the Company to have the necessary knowledge to develop their professional duties and obligations in compliance with the provisions of the Compliance and Anti- bribery Management System especially in the present Code of Conduct and the internal controls envisaged in the Program. These sessions are mandatory for all Members of the Company and an unjustified absence shall be considered a serious infringement and therefore it will be punished with the relevant sanction by the Supervisory Body.

Gender equality

The Members of INCATUK shall respect the right to equal treatment and opportunities between men and women. In general, they shall actively promote the absence of all sorts of discrimination either direct or indirect in reason of gender and the defence of an effective application of the principle of equality between men and women within the employment scope progressing in the establishment of measures favouring reconciliation of personal and professional life.

The Company shall adopt the necessary measures and decisions in case of any action representing or causing sexual discrimination.

Occupational health and safety

INCATUK is committed to the maintenance and development of the system for Occupational Hazard Prevention implemented, assuming the protection of employees as main objective boosting integration of Prevention at all Company levels.

Moreover, INCATUK shall adopt the necessary measures to eliminate or reduce risks guaranteeing compliance of legal requirements applicable promoting consultation and participation of employees, raising awareness of all employees regarding risks prevention.

Moral Integrity

INCATUK undertakes to monitor the moral integrity of its professionals guaranteeing the right to employment conditions respectful with the dignity of people. Therefore, INCATUK protects its Members from psychological violence acts and fight against any discriminatory or wrongful behaviour of people, their beliefs and preferences.

The Company shall adopt the necessary measures to avoid and if applicable, correct sexual harassment, mobbing and any other form of violence or discrimination avoiding in all Company professionals behaviours or speeches which may damage personal sensitivity.

- Relations with public bodies

Legality and integrity of relations with public bodies

The development of the activity of INCATUK requires the regular appearance in public tenders and bids both in the national and international scope. This circumstance involves the need to have regular contact with public bodies, national, international and foreign authorities and officials.

Relations with public bodies with which the Company has to interact will unfold according to the principle of the strictest enforcement of the legal system applicable.

Therefore, the Members of INCATUK will relate with public authorities and institutions in those countries where they develop their activities in a legal, ethical, respectful manner and in line with international provisions for the prevention of corruption and bribery. Those employees/professionals in contact with representatives of public administrations shall be specifically authorized by the company.

Employees in contact with public administrations shall document the decisions made and evidence compliance of internal and external standards applicable in order to ease the revision of regulatory compliance in this scope by third parties or Control Bodies of the Company.

As a general rule, no Recipient of the Company may offer, grant, request or accept either directly or indirectly, gifts or grants, handouts or compensations of any nature to or from any authority or official.

The only exception to the rule above is gifts or courtesies of little value given or reasonably according to local practices, transparent and given on the occasion of legitimate interests, socially acceptable and sporadic in order to avoid that its content or regularity may raise doubts of a third party on the good faith of the Member of the Company. Gifts in cash are expressly forbidden.

In any case, standard practices on gifts and courtesies shall be duly monitored, assessed and registered.

It shall be the responsibility of each Recipient to properly know and assess local practices bearing in mind the interest and good reputation of INCATUK. In case of doubt, you shall refer to the Compliance Officer.

INCATUK shall pay special attention to the strict fulfilment of tax regulations, security at the workplace and anti-money laundering applicable with respect to the obligations assumed with public administrations, both at a national and international level. Moreover, they shall make sure that the subsidies received by public administrations

are given an appropriate use and that their request is transparent avoiding false conditions for their granting or giving a different use from that for which they were granted.

Gifts, grants, handouts and favours

The provisions of the same section regarding the relationship with clients of the Company shall be applied.

INCATUK shall not make or accept any kind of gift or courtesy to/from public officials, public authorities or bodies in general which may be understood as exceeding normal courtesy practices.

In particular, any form of gift, courtesy or favour to Spanish or foreign public officials, auditors, directors, etc. is strictly forbidden which may influence in the independence of judgment of any decision-making body or induce to guarantee any sort of favour.

INCATUK shall refrain from carrying out practices which are not allowed by the applicable legislation, by commercial uses or by ethic or conduct codes, if known, of public administrations or bodies with which it has a business relationship.

The main feature of any gift of INCATUK is that its value shall only be symbolic and will be directed to promote the brand image of the Company. Any gift offered with such purpose, shall be managed and authorized according to the protocols of the Company.

Political Parties

Pursuant to the legislation of each country where the Company develops a project, it shall refrain from developing any forbidden activity in relation to the financing of political parties or sponsoring of events with the sole purpose of developing political activities.

Likewise, the Company shall refrain from making any kind of direct or indirect pressure of a political nature.

Right to competition and regulatory bodies

INCATUK meets and undertakes to meet any local, national or international regulation regarding the right to competition and shall exercise, when necessary, its duty of collaboration with market regulatory authorities.

- Relations with the community and the environment

Environmental policy

The Company before any project and depending on the circumstances shall contract a company specialized on the assessment of the environmental impact on soil, underground, air and water of the area that the project would involve.

Local, national and international communities

The aim of INCATUK shall be to contribute to the improvement of the quality of life and generation of wealth both through the provision of its services and through the development of its projects in certain cases by the promotion of the economic, social or cultural development of communities where it operates.

- Policy on personal data protection.

Security Document

INCATUK relies on a Security Document providing for the internal policy on personal data protection and security measures applicable to the files containing this type of data under responsibility of the Company.

Only the Members of the Company which require the treatment of personal data for the development of duties and obligations inherent to their position and professional responsibility will have access to them and shall be aware of the security measures applicable to the treatment of such personal data.

The document develops the standards of conduct that will serve as guideline for the Members of the Company in relation to personal data protection according to the current legislation.

These guidelines of action shall be applicable within the context of the work developed by the Recipients of INCATUK and shall be aimed at the protection of personal data both of professionals and of all third parties (suppliers, clients, representatives of public administrations, etc.) related with the Company.

Moreover this document outlines on the one hand, the rights to be respected by INCATUK regarding data protection and on the other, the legal and regulatory guidelines to be followed by the Company with respect to the treatment of personal data.

Duty of secrecy

The Members of INCATUK appearing at any stage of the treatment of personal data shall be bound to secrecy with respect thereto and to the duty of storing them.

This obligation shall subsist even after the end of its relations with the Company.

Rights of the Interested Party

INCATUK shall guarantee the custody of the following rights individuals may hold regarding the use and treatment of personal data. Such rights described below may be exercised under request.

– Right of access

Anyone shall be entitled to request and obtain free of charge any information of their personal data kept in the file responsibility of INCATUK, the origin of such data as well as the communications made or expected with respect thereto.

- Granting of access

The responsible of the file may decide on the request of access within the maximum period of one month from its reception.

The information may be provided by the responsible of the file by any means in a legible and comprehensible manner without using codes or passwords which require the use of specific mechanisms.

- Denial of access

Access to data may be denied when so expected by the Law or directly applicable EU standards.

- Right to rectification and cancellation

The Interested party is entitled both to the amendment of inaccurate or incomplete data and to the suppression of those inappropriate or excessive.

- Acceptance of rectification and cancellation

The Responsible of the File shall decide on the request within a maximum period of 10 days from its reception.

Were the information to be rectified or cancel previously transferred, the assignor shall notify the rectification or cancellation to the assignee for the latter to proceed to it in the same period of 10 days.

- Denial

The companies of the Company may deny the rights of rectification and cancellation were it considered by the Law or directly applicable EU standards.

- Right to opposition

The Interested party is entitled to request the non-treatment of his data or the interruption of such treatment in the following cases:

(a) When its consent for the treatment may be necessary as a consequence of the onset of a legitimate and justified reason referred to his personal situation; (b) when it refers to Files with commercial research or marketing purposes; and (c) when the treatment is aimed at the adoption of a decision referred to the interested party and based only on an automated treatment of personal data.

- Acceptance of the opposition

The company of the relevant Company receiving the request by the interested party shall resolve on the request in a maximum period of 10 days from its reception.

- Denial

The company of the Company which may have received the request by the Interested party may deny the right of opposition so that the affected party is subject to adopt a decision having legal effects based only on the automated treatment of data insofar as such decision is authorized by a Law establishing measures to guarantee the legitimate interest of the Interested party.

Safety in data treatment: control of access to data

INCATUK relies on the appropriate security measures to limit access to personal data, to formats containing them or to resources of the information system for the development of works not involving the treatment of personal data.

In case of external staff, the contract for the provision of services shall expressly consider the prohibition to access personal data and the secrecy obligation with respect to data which the staff may have known due to the provision of the service.

International transfer of data

The companies of INCATUK shall not transfer personal data to countries failing to provide a level of protection equivalent to that required in Europe unless, in addition to

complying with EEE standards, it obtains prior authorization of the Director of the Agency on Data Protection.

- Intellectual and industrial property.

Intellectual property and use of IT

The Members of the Company shall comply with the following standards when using the logic IT systems of INCATUK:

- They shall only use the mechanisms, tools and procedures approved to access the network of companies of the Company.
- All mechanisms, software or tools aside from those expressly authorized by INCATUK. Any program shall be installed by IT technicians of the Company or by those professionals contracted by INCATUK to such end.
- The Members of the Company shall under no circumstance share their passwords. If the password of an employee is known by another professional or by a third party for any reason, such professional shall change his password immediately.
- The Members of INCATUK shall not use the systems of the company to reproduce, obtain or send inappropriate material.
- The information property of the Company shall only be shared with authorized people.

The above commitments shall be included in the terms of the contracts for the provision of services signed by professionals of the Company without prejudice of them being bound by the standards included in this document.

Protection of industrial property of third parties

The Company shall be responsible for guaranteeing that all devices subject to industrial property rights of third parties are used by professionals respecting such rights.

INCATUK shall be liable for the correct payment of any encumbrance, licence and permit related to the device protected by an industrial property right.

Goods without the necessary licences shall not be acquired. If a professional is aware that an element of the device is being used or has been acquired without the required licence, he shall immediately inform the manager.