



Code of Conduct

ANYVERSE
PUBLIC

CONTENTS

OBJECTIVE	3
SCOPE	3
RESPONSIBILITY	4
COMPLIANCE	4
CONSEQUENCES OF NON-COMPLIANCE	5
MANAGEMENT RESPONSIBILITY	6
INCIDENT REPORTING (WHISTLEBLOWING CHANNEL)	6
FIGHT AGAINST CORRUPTION AND ILLICIT FINANCIAL ACTIVITIES	11
PROMOTION OF FAIR COMPETITION	12
PREVENTION OF CONFLICTS OF INTEREST	12
ENSURING AN ETHICAL ECOSYSTEM: RELATIONSHIPS WITH THIRD PARTIES	13
DATA PROTECTION AND PRIVACY	13
CONFIDENTIALITY AND PROFESSIONAL SECRECY	14
INTELLECTUAL PROPERTY AND DIGITAL ASSET MANAGEMENT	15
YOUR CONTRIBUTION IS ESSENTIAL	16
OUR PATH TO ENVIRONMENTAL COMMITMENT	18
EACH PERSON'S ROLE IN OUR GREEN MISSION	19
CROSS-CUTTING INTEGRATION OF RESPONSIBLE AND SUSTAINABLE GOVERNANCE (ESG) POLICY	19

Introduction to the Code of Conduct

At Anyverse S.L., a company committed to innovation in software solutions and synthetic data. Our reputation and success are based on ethical conduct, integrity and mutual respect. This Code of Conduct constitutes a fundamental pillar of our corporate culture and reflects our ongoing commitment to act responsibly, lawfully and in line with our core values in all aspects of our operations.

OBJECTIVE

Anyverse's Code of Conduct establishes a solid and consistent ethical foundation for the entire organization, ensuring that our activities are conducted professionally, transparently, and in full compliance with applicable legal requirements.

At Anyverse, we maintain an unwavering commitment to legal and ethical business practices. These expectations extend to all people linked to the company: employees, managers, collaborators and partners globally.

Since its founding, Anyverse has been committed to the highest standards of ethical conduct. This Code represents a fundamental pillar of our Responsible and Sustainable Government Policy, reflecting our shared responsibility to act honestly, fairly, and responsibly. It not only defines how we work, but also who we are as a company and what we believe in.

Integrity is the foundation on which trust is built, one of our most valuable assets. This trust – whether it comes from employees, customers, business partners, shareholders or public institutions – is earned and protected by complying with the law, respecting our internal commitments and acting in accordance with the ethical principles we declare.

This Code provides clear guidance for making responsible decisions, even in complex or ambiguous situations. It unites us around a common purpose and supports our mission to be a technology company with strong principles and a vision for the future. In short, it helps us to prevent behaviors or actions that may negatively affect the company's reputation or undermine the trust that others place in us.

SCOPE

This Code of Conduct sets forth the ethical expectations that should guide behavior and decision-making throughout Anyverse.

They work with or represent the company, regardless of their geographic location or function. This includes employees (permanent, temporary, part-time, or freelance), directors, senior officers, and members of governing bodies of Anyverse, as well as all of its affiliates, subsidiaries, and joint ventures.

We also extend these principles to our Business Partners—as suppliers, intermediaries, consultants and collaborators in strategic partnerships. Even if they are not directly part of our workforce, their actions have an impact on our organization. We therefore expect them to act in accordance with the spirit and principles of this Code. In some cases, we may require your formal acceptance and implementation as part of contractual agreements.

When Anyverse participates in businesses where it has no operational control, we promote the adoption of equivalent codes of conduct, reflecting the values and compliance expectations described in this document.

This Code is not intended to be exhaustive. In situations where there is no explicit standard, each person is expected to act with integrity, in accordance with applicable law, and in accordance with our core principles of fairness, transparency, and accountability.

RESPONSIBILITY

Living by the Code of Conduct is not optional, it is an essential duty for everyone to whom it applies. Each individual, whether part of our internal team or Anyverse representative, must consistently read, understand, and apply the principles outlined herein.

Responsibility starts with individual decisions. No commercial objective or purported benefit justifies conduct that contravenes our standards. A single mistake can jeopardize the trust we build with colleagues, customers, and communities. Ethical behavior not only reflects personal integrity, but it also defines our collective reputation.

Where applicable laws differ from the expectations of this Code, the highest standard must be followed.

Ignorance of the law or the Code will never be a valid excuse for non-compliance.

To facilitate compliance, Anyverse ensures access to resources, guidance, and clarification at all times. In case of doubt about what the appropriate conduct is, seeking advice is not only recommended, but expected.

COMPLIANCE

At Anyverse, maintaining our Code of Conduct is a shared responsibility, actively supported by structured oversight. Our leadership, in collaboration with the Board of Directors, ensures that this Code is not just a set of words, but a living standard embedded in our daily operations.

To ensure consistent alignment with our principles, we commit to the following:

- Awareness and Ongoing Communication: We give visibility and understanding to this Code through regular communications, induction processes, and regular updating activities.

- **Structured Compliance Mechanisms:** We implement training programs, internal controls, risk assessments, and management systems to monitor and strengthen compliance.
- **Problem Solving and Corrective Actions:** We promptly address any concerns and apply the necessary corrective actions when appropriate.

For our business partners, compliance is equally essential. We conduct due diligence before establishing new relationships and reserve the right to request corrective plans if necessary. Compliance with our standards – or equivalent standards – is a condition for continued collaboration.

By fostering a culture of ethical vigilance, we not only reduce risks, but strengthen our credibility and long-term sustainability.

CONSEQUENCES OF NON-COMPLIANCE

At Anyverse, we maintain a strict commitment to compliance, and violations of this Code of Conduct carry serious consequences. Any person subject to this Code who fails to comply with its principles will face appropriate disciplinary action, determined by the severity and proportionality of the breach. These measures may include, but are not limited to:

- advice or warning,
- formal reprimand,
- probation or suspension,
- job demotion,
- salary reduction,
- or, ultimately, the termination of the employment or contractual relationship with Anyverse.

These measures are independent of any administrative, civil or criminal proceedings that may be brought into the law. may arise from the infringement.

Disciplinary measures may also be applied to those who:

- do not detect violations,
- hide relevant information,
- retaliate against people who have reported misconduct.

For our business partners, failure to comply with this Code or any regulations applicable measures, as well as the failure to implement the required preventive or corrective measures, will have severe consequences. Anyverse reserves the right to suspend or terminate, in whole or in part, any business relationship with a Partner that does not comply with the rules and requirements stipulated in this Code.

This will also apply in the following cases:

- where due diligence reveals unsatisfactory practices, or
- when a corrective action plan has not been completed satisfactorily for Anyverse.

In addition, proven misconduct can affect remuneration. For example, any bribery attempt will not be tolerated under any circumstances and may result in immediate termination of the business relationship.

Anyverse will take appropriate action when its business partners fail to comply with our policies and contractual obligations.

MANAGEMENT RESPONSIBILITY

At Anyverse, our teams are the cornerstone of our commitment to integrity and compliance. Víctor González, CEO of Anyverse, together with the entire management team, firmly believes that solid compliance and unwavering integrity strengthen our agility, competitiveness and attractiveness in the market.

All members of the board of directors, management, and every person who works at Anyverse – including external partners – have a responsibility and commitment to uphold this Code and to ensure its consistent application throughout the organization.

Leaders and team leaders, in particular, have a special responsibility to lead by example. They are expected to:

- Foster an Ethical Culture: Create, promote, and actively maintain a culture of integrity, openly addressing the importance of business ethics.
- Promote Ethical Decision-Making: Encourage responsible decision-making and serve as positive role models through their conduct and actions.
- Proactively Prevent Misconduct: Take Preventative Measures Against Possible irregularities, addressing problems at their source and supporting staff in the compliance with the rules.
- Ensure Strict Compliance: Rigorously enforce all policies,
- applicable internal and external procedures and regulations.
- Protect Reporters: Prevent and sanction any form of retaliation against those who express concerns in good faith.
- Take Misconduct Seriously: Listen respectfully, without prejudice, to reports of misconduct, treat them seriously, and escalate them appropriately for investigation.
- Foster an Open and Safe Environment: Promote a work environment where all people feel comfortable and with the necessary confidence to express themselves without fear.

In addition, managers with personnel in their charge have the specific obligation to promote and guarantee, using all the means at their disposal, that situations of harassment, abuse, intimidation, or lack of respect or consideration do not occur within their teams.

INCIDENT REPORTING (WHISTLEBLOWING CHANNEL)

At Anyverse, we promote a culture of integrity and transparency, encouraging the reporting of behaviors that may constitute a legal violation or a violation of our internal regulations.

If an individual observes or has reasonable grounds to suspect a potential violation of our Code of Conduct, applicable law, or internal policies, they are required to report such concern.

This includes, but is not limited to:

- Irregularities relating to European Union law,
- Criminal offences,
- Serious administrative offences, and
- Violations of Anyverse's internal rules.

Anyverse makes available an Internal Information System (Whistleblowing Channel) as a preferential, confidential and impartial channel for this type of communication. This system is designed to protect the whistleblower against any form of retaliation, intimidation or unfavourable treatment, guaranteeing anonymity if desired and maintaining the confidentiality of the entire process.

Complaints can be made through the channels provided, including:

- Email: compliance@anyverse.ai
- Web Form
- Request for an in-person or remote meeting

Upon receipt of the communication, Anyverse agrees to:

- Confirm receipt within a maximum period of seven calendar days, and
- Diligently investigate the facts reported within a usual period of three months, with the possibility of extension in complex cases.

The entire process guarantees respect for fundamental rights, including the presumption of innocence of the people affected.

Anyverse will not tolerate false or bad faith reports, which may result in disciplinary action.

There are also external channels available to informants, in accordance with current Spanish legislation. However, Anyverse's internal channel remains the preferred means of reporting any violations.

Principles of Human Rights and Working Conditions

At Anyverse, we are deeply committed to upholding human rights and ensuring fair working conditions throughout our operations and throughout our supply chain. This commitment is based on widely recognized international standards, in line with the principles of the UN Global Compact, the ILO Principles, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises.

We expect all members of our staff, as well as our business partners, to suppliers and subcontractors, strictly comply with these principles.

The principles focus on the following critical areas:

- Prohibition of Child Labour and Protection of Young Workers

Anyverse strictly prohibits the use of child labor. We comply with all applicable laws and international standards on the minimum age for employment and the protection of young workers. No person below the minimum legal age established in the relevant jurisdiction may be employed.

- Wages and Benefits

We are committed to providing fair remuneration. Wages and benefits must meet or exceed legal minimums and industry standards, reflecting our commitment to living wages and equitable compensation practices. All benefits granted to employees must be aligned with current regulations.

- Working hours

We ensure that the working day complies with national laws, industry standards and applicable collective agreements. Overtime must be voluntary, compensated in accordance with legal requirements and managed responsibly, prioritising the well-being of staff and avoiding excessive working hours.

- Abolition of Modern Slavery

We maintain a zero-tolerance policy towards all forms of modern slavery,

including slavery, servitude, forced or compulsory labor, and human trafficking. We are committed to preventing, detecting and reporting any such practices within our organisation and in our supply chain.

- Freedom of Association and Collective Bargaining

Anyverse respects the right of all employees to freedom of association and collective bargaining. People have the right to form, join or support trade union organisations of their choice and to bargain collectively, without fear of reprisals, intimidation or harassment.

- Non-Discrimination and Harassment Prevention

We are committed to maintaining a fair, inclusive and respectful work environment, free from any form of discrimination, favouritism, violence, harassment or intimidation. We promote equal opportunities and reject any unequal treatment based on ethnic or social origin, skin color, biological sex, nationality, language, religion, ideology, age, physical or mental disability, gender identity, sexual orientation, political opinions, or any other status protected by law.

Any instance of harassment or discrimination will be treated seriously and will result in appropriate disciplinary action.

Health and Safety

Health and safety are fundamental pillars of our culture, essential for the well-being of our entire team and for the sustainability of our operations. At Anyverse, we are committed to promoting a work environment that not only complies with, but even exceeds applicable occupational risk prevention regulations, with the firm belief that all incidents are preventable.

This commitment extends to our remote work model and any temporary or external locations where our team operates.

Our Key Principles:

- Comprehensive Prevention

We prioritize accident prevention, health protection, and risk awareness at all levels of the organization. We apply a proactive approach to identify, assess and mitigate potential risks before they materialize. Our assessment methodology considers both the probability of occurrence and the severity of the potential harm.

- Active Safety Culture

We foster a culture where each person is responsible for their own safety, the safety of their colleagues and others. We promote constant vigilance, identification of unsafe conditions, and immediate action to correct them, without relying on others to report them.

- Continuous Training and Awareness

We offer appropriate and regular health and safety training, in accordance with current legislation. This includes information on risks inherent in each task, safe use of work equipment, emergency procedures, and promotion of healthy habits. Active participation in these initiatives is crucial for everyone.

- Ergonomics and Psychosocial Well-Being

We recognize the unique challenges of remote work and prioritize ergonomic and psychosocial well-being. This includes the correct layout of the workplace to avoid physical tension and visual fatigue, regular breaks, and the approach to mental health, work-life balance and the prevention of isolation. We strive to create a supportive environment that mitigates stress, anxiety, and other associated difficulties.

- Safe and Healthy Work Environment

We promote practices that guarantee a healthy environment. The consumption, possession or distribution of alcohol and other substances that may affect work abilities is prohibited. Any act of violence will be treated with zero tolerance. We actively work to prevent workplace harassment, including sexual harassment and discrimination, through clear reporting and investigation protocols, and the promotion of dignity and equality.

- Emergency Preparedness

We recognize the importance of being prepared for unforeseen situations, especially while telecommuting or in temporary locations. All teams should know the emergency numbers, the location of first aid kits, and basic emergency procedures at each work center.

- Incident and Accident Management

We are committed to actively combating occupational incidents and diseases. All accidents must be investigated promptly to identify root causes and implement corrective measures. Any changes in personnel, activities, equipment or temporary centers must be communicated immediately to reevaluate working conditions.

- Fire Protection

Although our software development activity involves limited use of chemicals, we prioritize the prevention of fires related to electrical equipment. We ensure proper ventilation of devices, prevent obstructions in air vents, keep equipment away from heat sources and prohibit flammable aerosols. In addition, we promote safe electrical connections and avoid overloads or cables in poor condition.

- Road Safety on Business Trips

For those traveling on business trips, we emphasize compliance with traffic rules, safe driving practices, and measures for pedestrian safety, such as avoiding distractions and maintaining attention on the surroundings.

- Extension to the Value Chain

We require our business partners, suppliers and contractors to meet our high health and safety standards. We promote social and environmental responsibility throughout the supply chain.

- Product Lifecycle Protection

Our commitment to health and safety extends to the entire life cycle of our products and services, ensuring maximum protection for our customers and society.

Business Ethics

At Anyverse, our commitment to ethical conduct is the foundation of every decision and interaction. We operate with unwavering integrity, transparency and fairness in all our global activities, recognising that truly ethical behaviour goes beyond mere legal compliance. Our dedication to honesty not only protects our reputation, but also cultivates a thriving environment based on mutual trust.

FIGHT AGAINST CORRUPTION AND ILLICIT FINANCIAL ACTIVITIES

Anyverse maintains a zero-tolerance policy against any form of corruption, bribery, money laundering, or financing of criminal or terrorist activities. These practices undermine legitimate trade, erode trust, and can cause profound social and environmental harm. This commitment is universal, whether in relationships with private entities, public officials, or any party interested in collaborating with Anyverse.

- Unwavering Stand Against Bribery

It is strictly forbidden to offer, give, solicit or accept anything of value – directly or indirectly – for the purpose of unduly influencing a business decision, obtaining an unfair advantage or obtaining an illegitimate benefit. This includes traditional bribery and influence peddling, even if the recipient is not directly the decision-maker.

- Corporate Courtesies and Responsible Sponsorships

Business courtesies (gifts, entertainment, or hospitality) should be legal, modest, and without implied commitments. It is forbidden to offer or accept gifts that are luxurious or that may be perceived as attempts to influence business decisions. All courtesies must comply with internal policies and be recorded with transparency.

Charitable donations and sponsorships must be expressly authorized, subject to due diligence, and never be linked to political parties or undue influence.

- Prohibition of Facilitation Payments

It is strictly forbidden to make facilitation payments (small informal payments to speed up government procedures). It will only be allowed in life-threatening situations, and must be reported immediately.

- Anti-Money Laundering Surveillance

We promote clean business practices and actively work to prevent money laundering, i.e., the concealment of the illicit origin of funds. We perform rigorous identity checks on customers and partners, and ensure that all financial transactions are transparent, correctly recorded, and associated with legitimate services. Any unusual payment requests (such as overpayments, transfers to unrelated accounts, or from high-risk jurisdictions) should be reported immediately to the Finance Department. We strictly comply with all national and international legislation on the prevention of money laundering and terrorist financing.

PROMOTION OF FAIR COMPETITION

At Anyverse, we are firmly committed to promoting a free and competitive marketplace. We compete exclusively based on the innovation of our software, the quality of our services and the talent of our team.

- Strict Compliance with Antitrust Laws

We respect all applicable competition and antitrust laws worldwide. Agreements or practices with competitors such as pricing, market or customer sharing, or the exchange of sensitive strategic information (e.g., pricing strategies or business plans) are prohibited.

- Ethical Gathering of Information

The collection of market intelligence must be done in a legal and ethical manner. Confidential information improperly obtained from competitors shall never be used.

- Surveillance in Interactions

All staff should exercise extreme caution when interacting with competitors, especially at industry events. If an attempt is made to start a conversation on sensitive topics, the person should immediately interrupt it, record their departure if they are in a meeting, and report the incident without delay.

PREVENTION OF CONFLICTS OF INTEREST

Each member of the Anyverse team has an obligation to act in the sole benefit of the company. Personal or external interests should never compromise objectivity or loyalty in business decisions. Even the appearance of a conflict can seriously damage our credibility and the trust of the parties concerned.

- Broad Definition of Conflict

We consider both direct conflicts (directly involving the employee) and indirect conflicts (linked to family, friends or close personal relationships). Decisions should be based solely on objective merits, never on personal ties.

- Obligation to declare

Any actual or potential disputes must be reported immediately to the Compliance Officer. Having a conflict does not in itself constitute a violation of the Code, but not declaring it is.

- Examples of Conflict of Interest

Some examples include:

- o Having relevant financial interests in Anyverse's customers, suppliers, or competitors.

- o Giving contracts to family or close friends.

- Receive personal benefits from companies that do business with Anyverse.
- Having outside jobs that interfere with or compete with the role at Anyverse.
- Take advantage of business opportunities discovered through the position.
- Using company resources or assets for personal gain.

All staff should avoid situations that may appear to be a conflict of interest.

ENSURING AN ETHICAL ECOSYSTEM: RELATIONSHIPS WITH THIRD PARTIES

At Anyverse, we aspire to build and maintain an ethical ecosystem, applying our standards to all our business partners as well. We recognize that the unethical or illegal actions of third parties can significantly damage our reputation, even without direct involvement.

- Shared ethical standards

We expect our partners—including vendors, consultants, and agents—to meet the same high standards of business integrity that we demand internally. This includes principles of human rights, anti-corruption, fair competition, data protection, environmental responsibility, and international trade compliance.

- Thorough Due Diligence

We conduct regular and rigorous due diligence processes with all current and potential partners, ensuring that we collaborate only with trustworthy and ethical entities.

- Responsibility in Relationships

The selection and retention of agents and intermediaries acting on our behalf is subject to a strict process that demands the highest standards of integrity. Using an intermediary to commit a misdemeanor (such as a bribe) is just as illegal as doing it directly. Ignoring the misconduct of a trading partner is also unacceptable. All personnel managing relationships with third parties must be fully informed of these requirements and maintain a vigilant attitude.

Data and Asset Protection

At Anyverse, the information, digital assets, and data entrusted to us are some of our most valuable assets. Their protection is not only a legal obligation, but a pillar of our integrity, reputation and operational excellence, especially as a software development company in a remote working environment. This commitment includes the protection of corporate knowledge, intellectual property and all personal data processed.

DATA PROTECTION AND PRIVACY

We are deeply committed to respecting and protecting the privacy of all personal data we process, whether it is from employees, customers, users, or external partners. Anyverse is

certified as compliant with current data protection regulations, including the General Data Protection Regulation (GDPR EU 2016/679) and the Organic Law on Data Protection and Guarantee of Digital Rights (LOPDGDD 3/2018). All our processing activities strictly comply with these regulations.

- Lawful Treatment for Specific Purposes

We only collect and process personal data for specific, explicit and legitimate purposes. Data is retained only for as long as necessary to fulfill those purposes or legal/administrative requirements, and then securely deleted or blocked. All processing activities are recorded in our Register of Processing Activities (RAT).

- Data Minimization and Accuracy

We ensure that the personal data collected is adequate, relevant and limited to the purpose for which it is collected, ensuring that it is up to date. It is the responsibility of the staff to keep their personal data up to date.

- Transparency and Data Subject Rights

We inform the data subjects about the purposes of the processing, its legal basis and the rights that assist them: access, rectification, deletion (right to be forgotten), limitation, portability and opposition. Clear channels are provided (usually through a dedicated email) and an agile and free response is guaranteed.

- Data Management by Third Parties

When we engage service providers who process personal data on behalf of Anyverse, we require written contracts with clauses that impose protection obligations equivalent to ours. In addition, we inform third parties whose personal data is collected within the framework of contracts and, where necessary, ask for their consent.

- International Data Transfers

Any international transfer of personal data is carried out only under adequate safeguards, ensuring protection in accordance with EU standards.

- Security Breach Management

We have a documented procedure and a designated person to manage data breaches. Any suspicion or confirmation should be reported immediately for investigation and, if appropriate, notified to the supervisory authority and those affected. We keep a historical record of incidents.

CONFIDENTIALITY AND PROFESSIONAL SECRECY

All Anyverse personnel – including employees and external collaborators – are bound by a duty of confidentiality and professional secrecy with respect to any non-public information to which they have access in the course of their business.

- Scope of Application

Confidential information is considered to be any technological, scientific, industrial, commercial, organisational or financial knowledge that is not in the public domain, has business value due to its confidential nature and on which Anyverse has applied reasonable protection measures. This obligation persists even after the termination of the employment or contractual relationship.

- Responsible Information Management

The information must be used only for its defined purpose, in accordance with the data protection policies. It must not be disclosed to unauthorized persons or used for personal purposes.

- Secure Document Management

Documents with personal data, both digital and physical, must be stored securely and accessible only to authorized personnel. The physical transfer must be carried out with appropriate measures. Obsolete records must be securely destroyed.

- Return of Information

At the end of the employment or contractual relationship, all documentation, supports and confidential information must be returned to Anyverse.

INTELLECTUAL PROPERTY AND DIGITAL ASSET MANAGEMENT

Our software, technologies, designs, and expertise are critical to Anyverse's competitive advantage. That is why we strictly protect our intellectual property (IP) and respect the rights of third parties.

- Protection of Company IP

Any intellectual property created in the course of work or through Anyverse resources belongs to the company. This includes software, methodologies, designs, data, or other creative works. Unauthorized use, reproduction or disclosure is prohibited. Staff are trained on their obligations in this area.

- Respect for Third Party IP

We respect the copyrights, patents, trademarks, and trade secrets of others. Any software or content used must be legally licensed or acquired. Any suspected violation should be reported to Compliance.

- Systems and Data Security

Our systems are protected by robust technical and organizational measures: authentication using unique users and two-step verification, strong and up-to-date passwords, licensed software, antivirus and firewalls.

- Responsible Use of Corporate Resources

The company's devices (computers, tablets, mobiles) are mainly for professional use. Limited personal use is allowed, as long as it doesn't affect work or violate policies. All activities on corporate devices can be monitored to ensure their integrity. Unauthorized software installation is not permitted.

- Mobile Device Security

Mobiles must have passwords or access patterns. Sensitive information should not be stored directly, but accessed from secure servers. The option to remotely wipe is enabled in case of loss or theft. The use of unsafe Wi-Fi networks or public chargers should be avoided.

- Mail and Digital Communication

Corporate email is used for professional purposes. Bulk sending of inappropriate content, forgery of senders, or unauthorized disclosure of trade secrets or customer/supplier data is prohibited. All digital communication is the property of Anyverse.

- Digital Disconnection

We support the right to digital disconnection outside working hours, protecting rest, privacy and family conciliation. This includes managing emails on vacation and training to prevent digital fatigue.

YOUR CONTRIBUTION IS ESSENTIAL

- **Protect Information:** Handle all corporate information, especially confidential and personal data, with extreme caution. Do not disclose it to unauthorized persons.
- **Maintain Digital Hygiene:** Use strong and unique passwords. Immediately report any suspicious emails, strange links, or unusual activity to IT.
- **Secure Devices:** Protect your corporate devices and don't leave them unattended. Report immediately in case of loss or theft.
- **Comply with Policies:** Familiarize yourself with and rigorously comply with all information security, data protection, and acceptable use of technology policies.
- **Report Immediately:** Report any security incidents, unauthorized access, or misuse of assets or information to the designated contact.

Compliance Efficiency and Continuous Improvement

At Anyverse, we are committed to maintaining a dynamic and effective compliance framework, which evolves along with our business, regulatory environment, and ethical expectations. We

believe that true compliance goes beyond written policies: it must be embedded in the organizational culture and continuously improved through active participation, constant monitoring, and adaptation.

- Integrated Compliance Management

Compliance is built into all business functions. All employees, contractors, and business partners must consistently apply our Code of Conduct and associated policies. While data protection is a key area, our compliance system covers a broader scope, including ethics, cybersecurity, intellectual property, labor standards, environmental responsibility, and anti-corruption.

- Continuous Evaluation and Policy Improvement

We regularly evaluate the effectiveness of our internal controls, policies, and procedures. This includes internal audits and risk-based reviews. Lessons learned from operational incidents, audits, or industry changes are used to review procedures and strengthen training programs.

- Continuous Training and Awareness

All staff participate in regular training sessions to ensure knowledge of legal obligations and internal expectations. New members receive initial training during the onboarding process, and refresher courses are provided when relevant policy or regulatory changes occur.

- Risk-Based Controls and Proactive Mitigation

We apply risk-based approaches to prioritize areas of compliance that require the most attention. Periodic evaluations and controls verifications are carried out in order to mitigate operational and reputational risks.

- External Cooperation and Regulatory Alignment

We cooperate fully with external audits, inspections and investigations carried out by competent authorities. Anyverse will provide the required information or data to public administrations or courts when legally required or necessary to defend our rights or those of our stakeholders.

- Transparency and Communication Channels

We have clear channels for reporting concerns, making inquiries, or requesting guidance. Employees and interested parties may contact the Compliance or Data Protection Officer through internal emails or designated platforms. Policy changes are proactively communicated to ensure consistent alignment and clarity. Through this cycle of continuous improvement, Anyverse reinforces its compliance culture and ensures that its actions remain integral, effective, and aligned with the expectations of regulators, partners, and society at large.

Environmental Responsibility and Sustainability

Our commitment to a sustainable future is an integral part of Anyverse's operating philosophy.

As a cutting-edge software development company, we take our global responsibility to protect the environment and promote sustainable development, recognizing that even our digital

presence generates an ecological footprint. Our environmental vision goes beyond regulatory compliance, driving us to innovate and integrate sustainable practices throughout our teleworking model and digital operations.

OUR PATH TO ENVIRONMENTAL COMMITMENT

We actively adopt an environmental management strategy focused on minimizing our impact ecological and in contributing positively to the planet. This strategy is embodied in the following pillars:

- Resource Usage Optimization

We are committed to efficient and responsible resource management. This includes extending the life of electronic equipment, optimizing digital storage to reduce data center energy consumption, and implementing best practices to reduce digital waste. We encourage conscious consumption and promote the principles of reduce, reuse and recycle, both professionally and personally, with an emphasis on proper waste management.

- Boosting Energy Efficiency and Use of Renewable Energy

Our operations are designed for maximum energy efficiency. We prioritize the sustainable use of energy across our digital infrastructure, including cloud services and our team's home environments in remote working mode. We actively seek partnerships with suppliers that use renewable energy sources, contributing to a transition to a decarbonized economy. Although our remote model reduces the energy consumption associated with traditional offices, we empower our employees to adopt conscious energy-saving habits in their personal workspaces.

- Reducing the Footprint and Fostering Circularity

We aim to prevent and, where possible, eliminate negative impacts on the environment. We continuously evaluate our software development processes to reduce associated energy consumption and incorporate circular economy principles into our purchasing and operations decisions.

- Fostering a Green Innovation Culture

We seek to improve our environmental performance by integrating sustainability criteria into our technological innovations and business processes. We develop products and services with efficiency and environmental compatibility, also enabling our customers to meet their own sustainable goals.

- Sustainable Collaboration with Third Parties

Our environmental commitment extends to our external relations. We proactively collaborate with our business partners and suppliers, encouraging them to adopt sound sustainable practices, thus strengthening an ethical and environmentally friendly value chain.

EACH PERSON'S ROLE IN OUR GREEN MISSION

Our collective impact is the sum of individual actions. Every member of the Anyverse team can actively contribute to our environmental mission by:

- **Conscious Resource Management**

Responsibly manage energy and resources in daily activities, both in teleworking and in temporary locations.

- **Proactive Waste Reduction**

Diligently reduce digital and physical waste, minimize printing, and engage in recycling initiatives.

- **Continuous Learning**

Stay informed about environmental best practices and participate in training and awareness programs provided by the company.

- **Vigilante Report**

Identify and immediately report any environmental concern or incident, to ensure adequate and timely action.

- **Promoting Sustainability**

Be an active agent in promoting environmentally friendly practices in all professional interactions and personal choices that reflect Anyverse's commitment to sustainability.

CROSS-CUTTING INTEGRATION OF RESPONSIBLE AND SUSTAINABLE GOVERNANCE (ESG) POLICY

As part of our commitment to sustainability, this Code of Conduct is articulated and complemented by Anyverse's Responsible and Sustainable Governance Policy, which represents the practical application of our ethical, social and environmental commitments in the day-to-day of the organization.

This policy specifies our vision of sustainability through three strategic axes:

1. **Ethical Business:** responsible decisions in technological development, fair commercial relations and prevention of bad practices.
2. **Inclusive Culture:** diversity, equality, emotional well-being and prevention of harassment.
3. **Environmental Protection:** reduction of the digital ecological footprint, eco-design and sustainability in teleworking.

Both documents are complementary: the Code defines the general principles of integrity and ethical conduct, while the ESG Policy establishes actions, strategic objectives and concrete KPIs to measure progress and consolidate a responsible corporate culture.

Compliance with this policy is an integral part of Anyverse's individual responsibilities and is actively incorporated into the processes of training, performance evaluation, monitoring, and continuous improvement of the ethical and organizational compliance system.

Annex

THIRD-PARTY RECOGNITION OF ANYVERSE'S CODE OF CONDUCT

Mrs. _____, in my capacity as an external collaborator in relation to contractual with Anyverse, I hereby declare that:

- I have received and reviewed the Anyverse Code of Conduct, and I understand the ethical principles, standards of behavior, and compliance expectations described therein.
- I acknowledge that Anyverse extends the application of this Code to all persons and entities acting on its behalf, including, but not limited to, consultants, agents, representatives, business partners, and affiliated organizations.
- I agree to abide by the values and standards of conduct reflected in the Code in all professional interactions and activities conducted in collaboration with Anyverse.

This statement confirms my alignment with Anyverse's culture of integrity and my commitment to act in a manner consistent with its ethical principles.

Signed by: _____



ANYVERSE

Approved by: CEO
Approval date: 19/12/2025

Revision History

VERSION	DESCRIPTION OF CHANGE	DATE
1	Initial preparation of the document	15/07/2025
2	Update following the audit on 22/12/2025	22/12/2025