



Policy of Compliance Criminal

BLUETAB SOLUTIONS, S.L.U.

Approved by the Administrative Body of in on on

December 22, 2023

| Information important about this document | |
|---|---|
| Identification of the Policy | <i>Policy of Compliance criminal</i> |
| Standards that replaces | None |
| Standards that repeals | None |
| Standards related that make up the Model of Compliance criminal | <i>Manual of prevention and response to crimes Catalogue of criminal risks and parameters of expected conduct</i> |
| Department or function to which it affects | All the departments and functions of BLUETAB |
| Personal to which it affects | <i>All Members of the Organization, Business Partners and Suppliers as appropriate.</i> |
| Responsible main of its surveillance | <i>Compliance Officer</i> |
| Date of approval | 22 of December of 2023 |
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1. Definitions

Listed below are the definitions of those concepts (cited in italics) *that* will be frequently used in this document and in the related *Standards* that make up the *BLUETAB Criminal Compliance Model*.

- **BLUETAB / the Organization:** BLUETAB Solutions, S.L.U. company dedicated to data architecture and consulting and which is part of the Bluetab Solutions Group, which in turn is part of the International Business Machines (IBM) group.
- **Administrative Body:** *Social* management body of BLUETAB *which* has assigned the fundamental responsibility and authority for the activities, governance and policies of BLUETAB *and to which* Senior *Management reports* and is accountable.
- **Compliance Officer:** *internal body of the BLUETAB of a single-person nature that is endowed with autonomous powers of initiative and control, which is entrusted, among other tasks, with the responsibility of supervising the operation and observance of the Criminal Compliance Model.* *Compliance* La existencia de este órgano responde a las exigencias establecidas en la normativa penal española (artículo 31 bis del Código Penal español) en cuanto a la supervisión del *Modelo de Compliance penal*.
- **Senior Management:** Management bodies of BLUETAB *to the extent that they direct and control the Organization*.
- **Members of the Organization/BLUETAB:** the members of *Organ of Administration*, members of the *Senior Management*, employees, workers or temporary employees or under a collaboration agreement and the rest of the people under hierarchical subordination of any of the above.
- **Business Partners and Suppliers:** any legal or natural person, except for the *Members of the Organization*, with whom the *Organization maintains* or plans to establish some type of business relationship. By way of example, but not limited to, these include clients, suppliers, intermediaries such as agents or commission agents, external advisors, *joint-Ventures* and, in general, natural or legal persons contracted by BLUETAB for the delivery of goods or provision of services.
- **Third:** *person physical or legal other than la Organization u organ independent which is related to this one.*
- **Interested parties:** for the purposes of *the Criminal Compliance Model*, this group includes natural or legal persons who, while not being *Business Partners* or *Members of the*

Organization, may be affected or perceive themselves as affected by a decision or activity of the *Organization*.

- **BCG o NCC:** *Business Conduct Guidelines o Normas de Conducta Comercial*. Documento de IBM al que se ha adherido *BLUETAB* que recoge los principales valores de la Organización, y cuyo principal objetivo es garantizar que las acciones y relaciones con sus clientes, inversores o resto de *Miembros de la Organización* se basen en dichos valores.
- **Criminal Compliance Model:** organization and management system for crime prevention, whose objective is the prevention, detection and management of *Criminal risks*, through its integration in the processes of business, so as the measurement for your improvement continuous, and whose essential basis is represented in the *Criminal Compliance Policy and in the Crime Prevention and Response Manual*.
- **Policy of Compliance criminal:** set of provisions contained in this document, hereinafter also referred to as the **"Policy"**.
- **Manual of Prevention and Response before Crimes:** document that has its protection in this Policy and includes the measures designed to evaluate, prevent, detect and manage early *Criminal risks*.
- **Standards:** Set of texts that collect the criminal Compliance obligations (both internal and external) that are applicable to the *Organization*.
- **People who occupy positions especially exposed:** people who play prominent roles in processes linked to *Criminal risk* greater than low, in accordance with the Criminal risks assessment exercise.
- **Criminal risk:** risk related to the development of conduct that could constitute a crime for which *BLUETAB* could be investigated, according to the criminal liability regime of legal entities established in the Spanish Penal Code.
- **Subjects affected by this document:** all Members of the Organization, as well as the Business Partners and Suppliers who it is determined, when it is advisable or necessary to transfer all or part of the contents of this document.
- **Informant:** person physical or legal that files a Complaint. The figure of the Informant includes:
 - *Miembros de la Organización:* incluye trabajadores cuya relación laboral se encuentre vigente, haya finalizado o no haya comenzado, accionistas y personas

belonging to *the Administrative Body*, paid or unpaid volunteers and trainees.

- *Business Partners y Proveedores*, así como cualquier persona que trabaje bajo la supervisión y la dirección de estos. Subjects or legal entities external to *the Organization*, with the that is has or poses set a commercial relationship, as well as any person working under their supervision and direction.
 - *Terceros* y otros individuos como, por ejemplo, representantes sindicales.
 - Cualquier persona, física o jurídica, con un encaje presente o futuro, en los contextos anteriores.
- **Communication:** Statement raising a question about the scope, interpretation or compliance with the regulations applicable to *BLUETAB*. Depending on its content, a communication may contain a *Query* or a *Complaint*.
 - **Query:** communication by which any *Member of the Organization* requests a clarification, response or criterion on the scope, interpretation or compliance with the regulations applicable to *BLUETAB*.
 - **Head of the Internal Information System:** *BLUETAB* *hhas* been appointed as *Head of the Internal Information System* the head of the Department of People and Culture, *having* the same management status, being entrusted with the functions of management of the *Internal Information System and processing* of investigation files in the capacity of notifying his/her appointment to the Independent Authority for the Protection of the Informant (A.A.I).

2. Purpose of the Policy of Compliance criminal of **BLUETAB**

This *Criminal Compliance Policy* develops the provisions of the IBM BCG applicable to BLUETAB and, consequently, aligns with its ethical values, ratifying its commitment to **maintaining conduct that respects both the regulations and its ethical values, thereby defining its framework of compliance principles and organizational aspects related to Criminal Compliance.**

This *Policy* is aligned with the culture of integrity and respect for the *Standards of BLUETAB* and takes into consideration not only the interests of the Organization but also the requirements that may come from its Stakeholders. In this sense, it is a text aligned with the strategic objectives of BLUETAB and, consequently, with its **determination of not to tolerate within its ranks any conduct that may constitute a crime.** Therefore, the maximum commitment of the Government Body and the Senior Management, as well as the rest of the Members of the Organization is required to comply with its provisions.

To start from this commitment from compliance, the parameters of conduct that are expected from the Subjects affected by this document, requiring them to make a commitment to them, describing the measures taken to monitor this command and the consequences in case of non-compliance.

3. Entities, people and activities affected

3.1. Entities and people affected

The present *Policy* is obligatory compliance and from application to *BLUETAB*. *BLUETAB Members* must comply with its contents, regardless of their position or location, unless the applicable law in the jurisdiction in which they operate provides for more stringent provisions, which shall prevail over this *Policy*.

A cause of *lo previous*, although the present *Policy* es of application to *the Members of BLUETAB*, may also be extended, in whole or in part, to the *Business Partners and Suppliers*, provided that the specific circumstances of the case so advise, complying in this way with the processes of due diligence due of *BLUETAB* in your selection from *Third parties* to guarantee the compliance with the criminal law, which establishes the *obligation* of *BLUETAB* to monitor the conduct of those who, being subject to the authority of their legal representatives and *de facto* or *de jure* administrators – in the case of *BLUETAB*, the *Governing Body*, *the Senior Management* and other persons with broad powers within *BLUETAB* –, may have engaged in criminal conduct due to a serious breach of the duties of supervision, surveillance and control over them, taking into account the specific circumstances of the case, regardless of whether they are *Members of BLUETAB*, *Business Partners* or *Suppliers*.

3.2. Activities affected

In addition to *this Policy*, there is a *Catalogue of criminal risks and expected conduct parameters* which summarises the different criminal figures for which, in accordance with the provisions of article 31 bis of the Spanish Criminal Code, legal persons may be investigated in Spain. These criminal figures refer to crimes¹ committed in the name or on behalf of the same, and for their direct or indirect benefit, (i) **by their legal representatives and administrators, de facto or de jure**, or (ii) **by persons subject to their authority, when** the commission of the crime, in this second case, is the result of a lack of due control, taking into account the specific circumstances of the case.

The content of *the Catalogue of criminal risks and expected conduct parameters* not only summarizes the different crimes, but also describes for each of them, the main activities that could lead to *Criminal risks*, all with the aim of ensuring that its recipients remain alert to situations that could expose them to said *Risks*

¹The Spanish Penal Code provides for the criminal liability of legal persons for the commission of a closed list of crimes (*numerus clausus*), which will be described in subsequent sections of this Policy, without prejudice to any personal criminal liability that they may have the *Members of the Organization* or the *Business Partners and Suppliers* that have committed on crime or who have cooperated or been participants in the same.

criminals in the exercise of their activities. Likewise, reference is made to the parameters of conduct that BLUETAB expects from the *Subjects affected by this document*, which may include references to other internal rules or procedures in this regard.

4. List of crimes and parameters of behavior

In the *Catalog of Risks criminals and parameters of conduct* expected the summary the criminal figures **for which any legal person** may be criminally liable under the terms provided for in the current Spanish Penal Code, said document not being detailed or closed, since, **along with the modalities provided below, there may be other ways of incurring in the criminal types.**

It is the obligation of every person to be duly informed of the Laws and their compliance. Hay que tener en consideración que el beneficio obtenido por una actividad ilícita tanto puede ser **directo** como **indirecto**, debiendo extremarse precauciones sobre cualquier conducta que, siendo ilícita, pueda terminar beneficiando a *BLUETAB* en ese sentido tan amplio. Likewise, legal entities will not only be liable for actions or omissions occurring in Spain, **but also for events in any other country if certain circumstances occur**. This requires them to remain vigilant against potentially criminal conduct under Spanish law that occurs abroad.

In this regard, if you have any questions regarding the content of this section or wish to obtain more information about it, you can contact *the Compliance Officer of BLUETAB* and/or consult the criminal figures in [the current Spanish Penal Code \(www.boe.es\)](http://www.boe.es).

5. Content

BLUETAB's Criminal Compliance Policy is based on both the principles and values set out in the BCG, as well as on the requirements set out in article 31 bis of the Spanish Criminal Code, which are set out below:

5.1. Compliance Officer

5.1.1. Composition

BLUETAB has a *Compliance Officer* that has attributed functions of crime prevention and will be responsible for making this Policy effective through the implementation of the different measures provided for in the *Criminal Compliance Model* that supports it.

El *Compliance Officer* es un órgano unipersonal que encarna el *Head of Management Control, Procurement, Facilities & Compliance* y que depende jerárquica y funcionalmente del *Órgano de Administración de BLUETAB*, a quien reporta directamente sus actividades, así como a la *Alta Dirección*.

The *Compliance Officer* will have with the support² of the Department of:

- **People and Culture:** that will apply the relevant disciplinary measures in on in case of violations of this *Criminal Compliance Model* or the rest of the *Standards* of *BLUETAB*. Likewise, it will carry out periodic reports to the *Compliance Officer* on the management of the Complaints Channel by the Director of the Department in its condition of *Responsible of System Internal of Information*.

5.1.2. Autonomy e independence

The *Governing Body* has appointed the *Compliance Officer*, granting him or her independent powers of initiative and oversight, as well as the maximum possible independence to carry out his or her duties, ensuring that he or she is free from any business constraints that could hinder the performance of his or her duties.

² It is worth highlight that the *Head of Management Control, Procurement, Facilities & Compliance* may be assisted of any Department of *BLUETAB*. However, the Department of *People and Culture*, taking into account the synergies with *Compliance*, will support the *Compliance Officer* in the development of his/her functions.

In this sense, the *Compliance Officer* performs his duties autonomously, without requiring specific mandates to do so, under the provisions of this *Policy* and the provisions of the *Crime Prevention and Response Manual*.

In the terms provided in this *Policy*, the *Compliance Officer* enjoys the full support of the *Government Body*, which is entrusted with the responsibility of supervising the operation and observance of the *Criminal Compliance Model*. In this regard, it is authorized to freely access both the documents of the *Organization* and the *Members of the Organization* that it requires for the performance of its duties. All *Members of the Organization* are obliged to immediately provide you with the documents and information you request in the exercise of their functions.

The independence of the *Compliance Officer* guarantees neutrality in decision-making. This independence is supported by its access to the *Governing Body* and, therefore, the distancing from the team management and managers in charge of operational management. Additionally, the evaluation of the performance of the *Compliance Officer* ultimately corresponds to the *Government Body*, since it has been the one who directly granted the delegation to the effects of supervision of its *Criminal Compliance Model*.

5.2. Responsible of System Internal of Information

5.2.1. Composition

The *Organ of Administration of BLUETAB* has designated as *Responsible for the Internal Information System* to the person in charge of the *Department of People and Culture*, as the responsible person physical for character management, being entrusted the own functions of management of *System Internal of Information* and of processing of investigation files in order to notify the Independent Whistleblower Protection Authority (I.A.I.) of their appointment.

5.2.2. Autonomy e independence

The *BLUETAB Internal Information System Manager* must perform his/her duties independently and autonomously from the rest of the *BLUETAB bodies*.

In this sense, he/she may not receive instructions of any kind in the exercise of his/her functions, and must have all the necessary personal and material means, provided by the *Administrative Body*, to carry them out.

In this way, the *Internal Information System Manager will be the person* responsible for carrying out the details of his/her duties related to the reception and investigation of internal Complaints *received* in accordance with the provisions of the *BLUETAB Complaint Management and Investigation Procedure, being responsible* for their due and diligent processing and being able to rely on the people and/or external resources that he/she designates and considers necessary for this purpose.

5.3. The Body of Administration and the High Address of *BLUETAB*

The *Government Body and the Senior Management of BLUETAB* not only support the *Compliance Officer* in the performance of his duties, but also actively promote the *Compliance culture* in the *Organization*, ensuring because this has of the appropriate resources to effectively execute the *Criminal Compliance Model* and promoting the use of procedures and channels enabled for the communication of potentially criminal conduct that may affect the *Organization* and its activities, among other issues.

The leadership they exercise in *BLUETAB the Government Body and the Senior Management* leads them to have assigned, in addition to the obligations that *all Members of the Organization* have, the highlighted obligations detailed below.

(i) **Obligations of *Body of Administration***

The *Body of Administration* is responsible of approve formally the present *Policy* – as well as any updates that may be required – and to promote the adoption and implementation of a *Criminal Compliance Model* suitable for *BLUETAB*, suitable for preventing, detecting and managing the *Criminal Risks* that threaten the *Organization*.

In compliance with the provisions of the Spanish Criminal Code, *BLUETAB* assigned the supervision of the operation and compliance of the *Criminal Compliance Model* to the *Compliance Officer*, with the *Administrative Body being responsible* for its appointment and granting it the necessary autonomous powers of initiative and control, as well as the appropriate and sufficient financial, material and human resources to enable it to carry out its work effectively.

As the entity responsible for adopting the *Criminal Compliance Model*, the *Governing Body* is responsible for periodically evaluating its effectiveness, modifying it, if necessary, when it becomes aware, through any means, of the existence of serious non-compliance or when significant changes occur in the circumstances affecting the *Organization*, in the assessment of its *Criminal Risks* or in the *Criminal Compliance* objectives set by the *Organization*.

Likewise, under the terms established in *the Criminal Compliance Model* regarding criminal compliance reports, *the Governing Body* receives, reviews, and endorses the reports provided by the *Compliance Officer*, adopting any actions suggested by the *Compliance Officer* and promoting those it deems most appropriate for the proper management of the *identified* criminal risks.

(ii) Obligations of the *High Address*

The *BLUETAB Senior Management* collaborates with *the Management Body* in the performance of its responsibilities, especially with regard to regarding the transmission of the culture of *Compliance* in *the Organization* and its zero tolerance regarding conduct that may lead to the commission of illegal acts.

By your proximity to the targets strategic and operational of *BLUETAB* and his hierarchical position, the *High Management* is responsible for manage and support to all *the Members of the Organization* in the exercise of their obligations in matter of *Compliance*, ensuring that all of them integrate them into the development of their daily activities in the *Organization*.

It must ensure also the availability of adequate resources and sufficient for the effective implementation of *Criminal Compliance Model*, internally communicating the importance of said execution of manner consistent with lo established in this *Policy*.

Senior management must also identify and act to manage potential or actual conflicts of interest when there are situations in which responsibility or authority for decision-making is delegated in areas where criminal risks exist.

The *Senior Management* participates in the processes of identification, analysis and evaluation of *the Risks criminal* when it is required for this, taking charge in addition of encourage among *the Members of the Organization* the use from the channels enabled to these, as well as to *the Business Partners, Suppliers and Third parties* for the communication of potentially illicit conduct that may affect *the Organization* and its activities.

In lo relative to the communications of *the Members of the Organization* about related activities with *Criminal risks*, *the High Address* guarantees the absence of retaliation, discrimination or sanctions for communications made in good faith or for actions aimed at avoiding participation in illegal acts.

5.4. Obligations of the Members of the Organization

All Members *of the Organization* are responsible for understanding, observing and applying the provisions *of this Criminal Compliance Policy*, collaborating *with the Compliance Officer, the Government Body and the Senior Management* when necessary, and observing, in particular, the behaviors expected of them with respect to the offenses contained *in the Criminal Risk Catalog and conduct parameters expected*.

Likewise, all Members *of the Organization must* immediately communicate any action to through the the channels of communication to avoid or remedy the eventual commission of a crime or potential crime of which they are aware and/or that is being managed without the apparent intervention of the *Compliance Officer*.

In addition, all Members of the *Organization are expected to* attend training sessions which, on criminal matters and *Compliance law*, are determine with reason of your function or position in the *Organization*, y provide in manner immediately the information and documentation that request the *Compliance Officer*.

6. Knowledge and declaration of conformity

The present *Policy* is delivered mandatory at the new incorporations and is available to all *BLUETAB Members* at

- Intranet: Confluence-Bluetab España-Políticas&Procesos
- Web: <https://bluetab.net/es/legal/>

Likewise, *BLUETAB* makes this *Policy* available to its *Business Partners and Suppliers* through its website <https://bluetab.net/es/legal/>.

For *Members of the Organization* who occupy positions especially exposed to a *Criminal Risk*, their annual declaration of compliance with this *Criminal Compliance Policy* will be requested through the model attached as ***Annex II***.

7. Communication of behaviors

All *BLUETAB Members* have the **obligation to report on individual or collective behavior or activities that occur** in the context of their activities in *BLUETAB* and which may believe a contravention of contents of the present **Policy** or the rest of the documents of the **Criminal Compliance Model**, regardless of whether such behavior has been ordered or requested by a superior.

The operation and supervision of this *Policy*, as well as the control of its compliance, correspond to the *Compliance Officer* designated by the *Government Body*. To this end, *BLUETAB* will provide the *Compliance Officer* with all the material, human, technical and economic resources necessary to perform his or her duties.

In order for this *Policy* to be *effectively* applied, *BLUETAB* has provided itself with various internal reporting and communication mechanisms. Therefore, any complaints from Members of the *Organization, Business Partners, Suppliers and Third Parties* regarding criminal prevention may be filed through these **different channels of the Organization**.

In particular, *BLUETAB* account with the following ways for the consultation or report of practices contrary to the values or internal regulations of *BLUETAB*, as well as any violation of current legislation.

- Communications **written**:
 - To through of mail electronic directed to *Responsible of System Internal of Information*:

canal.preocupaciones@bluetab.net

- To through of a form electronic on on next link:

Channel of complaints of [BLUETAB](#)

- By mail postcard to:

To the Attention of the Complaints
Channel Department of People of
BLUETAB Ruiz Picasso Building,
Pl. Pablo Ruiz Picasso, 11, 2nd Floor,
Tetuán, 28020 Madrid

- Communications **oral**:
 - To through of upper hierarchical
 - To through of Responsible of other department.
 - To through of *Compliance Officer*.
- In-person **meeting** with *the Internal Information System Manager* within a maximum period of seven (7) days from the request. This communication will be previously informed that it will be recorded and the Informant *will be informed* of the processing of their data in accordance with current legislation.

Likewise, *BLUETAB* has a channel for reporting complaints, which is identified in the Complaints Channel Policy.

Furthermore, *the Organization* informs potential *Informants* that they also have external channels of information available to the competent authorities and, where appropriate, to the institutions, bodies, offices or agencies of the European Union, such as, among others:

- En materia de defensa a la competencia: [Denuncia de conducta prohibida | CNMC](#)
- En materia de infracciones tributarias: [Agencia Tributaria: Denuncias](#)
- En caso de estar relacionado con subvenciones o fraudes con afectación a los fondos europeos: [Buzón antifraude - Canal de denuncias del Mecanismo para la Recuperación y Resiliencia | Plan de Recuperación, Transformación y Resiliencia Gobierno de España. \(planderecuperacion.gob.es\)](#)
- National Anti-Fraud Coordination Service: IGAE: [National Anti-Fraud Coordination Service Anti-Fraud \(hacienda.gob.es\)](#)

Likewise, *is* puts in knowledge of the possible *Informants* the existence of a public body called the Independent Whistleblower Protection Authority, to whom they may also apply.

Although, the use of internal channels mentioned as the preferred channel of communication is recommended.

8. Consequences of non-compliance

In accordance with what is established in *this Policy*, so as in the *Manual of Prevention and Response before Crimes*, all the *Subjects affected by this document*, with regardless of their hierarchical level and geographic and/or functional location, have the obligation to comply with the principles and procedures established in the BCG, as well as with the other *Standards* that make up the *Model of Compliance criminal* of BLUETAB, on how much less sea of application. Likewise, in order to ensure the correct development of the *Criminal Compliance Model*, you are urged to report any violation of these, in the terms set out in *this Policy*.

When the *Compliance Officer*, or the *Internal Information System Manager*, as a result of the complaints received, investigates and confirms the violation of the provisions of this Policy, he/she will propose to the *Administrative Body* measures to be adopted, including disciplinary measures (in the labor field) or contractual measures (in commercial relations with *Third Parties*) that he/she considers proportional to the risk or damage caused. These measures will not only be projected on the subjects whose conduct has caused the risk or harm, but also on those *Members of the Organization* who have not followed the procedures established by BLUETAB for their prevention and response, a circumstance that is considered in itself a violation of the ethical values and principles to which BLUETAB is committed.

The measures adopted from a labor perspective will be compliant with applicable regulations, without losing force or proportionality with the seriousness of the underlying events. The workers' legal representatives will be informed, if appropriate.

In the case or where there are clear indications that the actions of any *Member of the Organization* could constitute a criminal offense, such circumstance shall be brought to light to the *Authorities Public* competent for his knowledge and pursuit. Such communication s will accompany with the evidence and/or indications that be have been able to collect about it.

Annexes

Annex I

Entities adhered a la *Policy de Compliance criminal* de *BLUETAB*

| Entity Name social | Date of accession | Corporate body that has formalized the adhesion |
|-------------------------------|--------------------------|--|
| BLUETAB SOLUTIONS, S.L.U. | 22 of December of 2023 | Administrator Single |

Annex II

Declaration formal of conformity

Personnel who occupies positions especially exposed



Declaration of conformity

By means of this document, the undersigned acknowledges having received the following documents, having read them and being in agreement with their content:

- *Business Conduct Guidelines* [\[link\]](#)
- *Policy of Compliance criminal* [\[link\]](#)
- *Catalog of risks criminal and parameters of behavior expected* [\[link\]](#)
- *[Other policies of the Organization] (specify)*

Therefore, he declares that he is committed to its content and to developing the behaviors established therein.

These documents govern matters of importance to BLUETAB, and failure to comply with them may result in extremely serious consequences in the workplace.

Name:

Signature:

Date of the declaration: