



Corporate Responsibility Policy

1. Purpose

Ubiquus Spain, S.L.U. is a company that manages the language resources of its clients in terms of document management, translation and publication of multilingual projects.

For the management of Ubiquus Spain, S.L.U., society and company are two realities that interact and complement each other: the company, for its proper operation, needs to be implemented in a healthy society and society needs sustainable companies that generate work, wealth and innovation.

Our corporate vision, mission and principles are founded on this belief.

2. Vision, mission and principles

Vision

To be a service provider with steady growth in profits, which sets itself apart by delivering its clients the most suitable solution and providing its employees with an environment that fosters professional and personal growth. With this goal in mind, socially responsible and environmentally friendly business strategies are devised and rolled out to meet today's needs without compromising those of tomorrow.

Mission

At Ubiquus Spain, S.L.U. we meet our clients' document management, translation and publication needs in a responsible, efficient and competitive way; we facilitate the professional and personal growth of our employees; we treat our suppliers fairly and correctly; and we actively contribute to the development of our society and the environment by working to the principles of ethical social responsibility management.

Principles

- Client-driven;
- Concern for people;
- Social responsibility;
- Focus on results;
- Sustainability.

3. Stakeholders

To fulfill our mission we explain the organization's responsibilities to the various stakeholders, building relationships based on respect and trust:

- **Shareholders:** We apply the principle of transparency, accountability and guarantee the proper use of capital and profits.
- **Client:** We listen to what our clients need so we can give them the service or product that they really want.
- **Suppliers:** We provide training, stability and motivation.
- **People:** We are aware of the importance of everyone in our organization. This is why we strive to provide job security, incentive packages, a work/life balance, training, stability and motivation, as well as cooperation, target-led management, and diversity.
- **Group companies:** We are part of Ubiquus and we foster relationships with other companies in the group, facilitating good cooperation based on trust and common interests.
- **The environment:** Although our activity does not have a big impact on the environment, we encourage the sustainable use of natural resources (cutting down on electricity and paper, for example), seeking to cut down on non-biodegradable waste and making sure it is discarded responsibly.
- **Company:** We firmly believe that running our company in an ethical way benefits the society we live in. We seek to apply the principles of responsibility and accessibility of our service to all those who come into contact with us.

4. Integrated Management System

In line with our vision, mission and principles, the company has set up and put in place an integrated management system consisting of:

1. Corporate Social Responsibility Management, as per the SGE21:2008 standard "Ethical and CSR Management System", as the core of the integrated system.
2. Quality Management, according to standard ISO 9001:2015 "*Quality management systems. Requirements*" and standard ISO 17100:2015 "*Requirements for translation services*".
3. Information Security Management, as per the ISO/IEC 27001:2013 "Information technology – Security techniques – Information security management systems – Requirements" and applying the requirements and criteria of SGE21:2008 standard "Ethical and CSR Management".
4. Environmental Management, as per the SGE21:2008 standard "Ethical and CSR Management" and applying the requirements of ISO-14001:2004.
5. Occupational health and safety.
6. United Nations Global Compact principles.

The purpose of the Integrated Corporate Responsibility System is to bring all the organization's current management systems under a sustainability framework in which the key issues for ethical and responsible management – financial, information security, social and environmental - work in harmony.

This framework is built upon the strict observance of the legislation applicable to each area we are engaged in. This leads the whole organization to strive for ongoing improvement (beyond that demanded by law) towards a harmonious world not just for our children, but for our children's children.

Quality Management System

The main aim of the quality management system is the ongoing improvement in the quality of the following areas:

- Customer service;
- Project management;
- Language services.

We shall achieve this goal by:

- ✓ Complying with all legal and technical requirements.
- ✓ Focusing all Company activities and decisions on meeting our clients' needs and expectations.
- ✓ Assuring quality in all activities and processes to provide a strong underpinning for our service to clients.
- ✓ Fostering staff empowerment and initiative so that our people work more efficiently and effectively towards Company goals.
- ✓ Instilling a spirit of constant improvement in all activities relating to clients.
- ✓ Continuously upgrading the Company's technological resources so they are always geared to growing the business.

Environmental Management System

The purpose of the environmental management system is to protect the environment by undertaking the following:

- ✓ A commitment to comply with laws and regulations in all our operations and services, and in any further requirements relating to the environment; striving to go beyond those requirements as far as possible.
- ✓ Planning our activities so as to avoid pollution and ensure ongoing improvement of our environmental performance.
- ✓ Minimizing the environmental impact of our activities by taking special care with waste management. We should reduce, re-use and recycle waste products as far as possible, and dispose of them so as to ensure minimal environmental impact.
- ✓ Fighting climate change as far as we possibly can.

- ✓ Boosting environmental education and awareness among our employees.
- ✓ Explaining our environmental commitments to everyone concerned and any other interested parties.

Information Security Management System

The information security management system pursues the protection of the information generated and used during the undertaking of our activities. The goals of the System are:

- ✓ To continuously improve our security, procedures, products and services.
- ✓ To comply with legal requirements and client requirements (whether express or implied) relating to information security.
- ✓ To assure the confidentiality, availability and integrity of the information arising in the management of the projects.
- ✓ To assign functions, resources and duties effectively.
- ✓ To raise awareness among the people in the company and provide them with training and motivation on the importance of developing and implementing an Information Security Management System; to make clear how the System relates to meeting clients' expectations and protecting their information.
- ✓ To adapt the company to the requirement for ongoing technological innovation.
- ✓ To evaluate and plan ways of limiting the risk of information loss, disclosure or unauthorised access.

Occupational Health and Safety

The Management at Ubiquus Spain, S.L.U. has expressed its intention to further the ongoing improvement of health and safety conditions in the workplace by taking on board the following:

- ✓ Devise, develop and roll out an Occupational Health and Safety Plan based on the legislation applicable to this issue.
- ✓ Include the requirements in the Plan to incorporate this issue into the management of the company. Thereby making this issue the responsibility of each and every person in the company.
- ✓ Provide suitable resources to carry out the Plan and brief everybody on it and encourage its compliance.
- ✓ Engage everyone in the Plan, encouraging their cooperation in its roll out and in taking up corresponding duties.

United Nations Global Compact

The Company observes and, where possible, enhances the *Principles of the United Nations Global Compact* in the undertaking of its operations.

In this way its human rights, labour, environment and anticorruption principles have been incorporated into the undertaking of its operations.

A Progress Report is drawn up on a yearly basis to highlight our progress in Global Compact matters.

5. Anticorruption Policy

Ubiquus Spain, S.L.U. is engaged in an environment with a very low risk of bribery and corrupt practices. However, in accordance with the *Code of Principles and Conduct* and the *transparency* policy in place, the conduct of everybody in the company is bound by the principle of integrity, which implies honesty in the performance of activities. In this respect:

- ✓ For the directors, in particular, criminal bankruptcy, concealment of facts or relevant information, money laundering, tax evasion and exercise of undue influence are forbidden.
- ✓ Any form of corruption between individuals, payment of commissions or bribery of third parties, taking bribes or extortion, regardless of the environment in which they arise is prohibited.
- ✓ Any conflict of interest that may arise in the undertaking of the company's operations must be reported to the line or department manager, in addition to any form of nepotism, privacy offences, the use of goods or services of the company for private uses.
- ✓ As part of normal use and customs, low-value promotional gifts; invitations not exceeding the limits considered socially reasonable; invitations to seminars, training programmes or other acts authorised beforehand; gifts for special occasions or Christmas invitations provided their cash value does not exceed €50 may be accepted. Any other gifts received by individuals are to be placed at the disposal of human resources, which will make internal arrangements for the fair distribution of such gifts.
- ✓ Individuals may not offer gifts to third parties on behalf of the company unless expressly authorised by Management.
- ✓ Any employee who is apprised of conduct related to bribery or corruption must report it to their line manager or report it through the communication channels in place with Management.

6. Communication

The Management and staff of the Company take on this integrated management system as a shared project and a guide in all their activities.

This policy has been notified to all staff, and is understood, applied and kept up to date at all levels of the Company. Its efficacy and compliance is regularly monitored.

7. Research, development and innovation

Any research, development or innovation projects on company processes (or on new ways of doing things) will be conducted in line with the *Code of Principles and Conduct* and with business ethics pertaining to corporate responsibility.

In particular, their consequences on information security and the environment will be taken into account in order to lessen their impact as far as possible.

Madrid, 28 September 2018.



A handwritten signature in blue ink is written over a red logo. The logo consists of a stylized red cube-like shape on the left, followed by the word 'SOLUCIONES' in red capital letters. The signature is written in a cursive style, crossing over the logo.

REVISION OVERVIEW				
REV No.	Date	REASON FOR REVISION	Approved	Approved by:
Rev. 6		Version six	CRC	DG
Rev. 7		Version seven: For monitoring audit of 27th and 28th November 2006. Inclusion of inspection of changes	CRC	DG
Rev. 8		Version eight: Update to standard UNE-EN ISO 15038:2006	CRC	DG
Rev. 9		Version nine: For monitoring audit of 8th May 2007. Modification of the section on environmental legislation and BS ISO 27001:2005	CRC	DG
Rev. 10		Version ten: For adaptation to the Principles of the United Nations Global Compact	CRC	DG
Rev. 11		Version eleven: For updating the ISO 9001:2008 standard, modification of Quality, Environment and Information Security Officer to Corporate Responsibility Manager	CRC	DG
Rev. 12		Version twelve: Integration of all systems to the new ethically and socially responsible management in line with SGE21:2008	CRC	DG
Rev. 13		Inclusion of code of principles to CR policy	CRC	DG
Rev. 14		Changes in integrated system of corporate responsibility	CRC	DG
Rev. 15		Changes in integrated system of corporate responsibility and in standard 27001	CRC	DG
Rev. 16		Change due to integrity and transparency policy	CRC	DG
Rev. 17	24/02/2016	Changes to standards 15038 and 9001	CRC	DG
Rev. 18	07/07/2017	Change in company control	CRC	DG
Rev. 19	28/09/2018	Change in company name	CRC	DG