

TUNSTALL'S CRIMINAL COMPLIANCE POLICY

Tunstall, in order to implement the necessary actions to promote a true ethical business culture and respect for the Law, declares its commitment and responsibility in the implementation and maintenance of a system for the **control and prevention of criminal offences**.

Thus, it establishes and approves the following **Criminal Compliance Policy**, in accordance with Tunstall's main values in the development of its activity, highlighting, among others, the commitment and responsibility towards our users, our customers, our professionals and society in general.

Throughout its history, Tunstall has maintained a corporate commitment to the different stakeholders that are part of those who interact with the company or its employees. This commitment has been based on **ethical principles that guide the company's operations and which form part of its corporate culture** applicable to the provision of telecare and healthcare services for the elderly in Spain, as well as the sale and distribution of technology for the provision of these services.

All members of the organisation shall be committed to comply with this Policy and to achieve the objectives derived from it, in order to prevent and detect as far as possible the commission of offences.

The **general principles** that promote the Criminal Compliance Policy are:

1) Demanding that each member of the organisation at all times a strict compliance with the Law and the stipulations of the Spanish Criminal Code, prohibiting the commission of criminal acts, in accordance with the provisions of the *Crime Prevention Plan* and safeguarding the integrity and good reputation of Tunstall.

2) Identifying, preventing and evaluating criminal actions and risks that may be committed in the organisation, in order to minimise its exposure to them through procedures, controls and action plans to comply with the requirements to which Tunstall is committed.

3) Commitment to the continuous improvement of the *Crime Prevention Plan* through its periodic updating, in order to identify possible new risks not initially contemplated and to adapt the Plan to the needs that may arise in the organisation.

4) Encourage responsible behaviour by all members of the organisation, imposing an obligation to report circumstances or facts that could potentially be irregular, suspicious or criminal in nature. Diligent conduct will be exercised in protecting the identity of the informant, ensuring that he/she will not suffer reprisals.

5) Disseminating among all members of the organisation the consequences of actions constituting a crime related to the *Crime Prevention Plan*, as well as the application of sanctions for offenders and respect for the rights of persons under investigation.

6) The *Crime Prevention Plan* will be distributed to all interested members of the organisation and will be available for their knowledge and consultation through the different channels selected for this purpose.

7) The Chief Compliance Officer (CCO) has been appointed according to the principles of independence and absence of conflict of interest. At the same time, sufficient resources have been made available to ensure its effectiveness. It has been set up as an independent body with autonomous powers of initiative and control, entrusted with the function of supervising, monitoring and controlling the effective implementation of Tunstall's Crime Prevention Plan throughout the organisation.

In San Fernando de Henares (Madrid), 28 October 2019.



Fdo. Abel Delgado Maya
CEO-Chief Executive Officer Southern Europe