




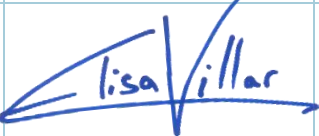

SUAVAL Group CONDUCT CODE

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1. INTRODUCTION

The present CONDUCT CODE AND ETHICS (hereinafter, the **CODE**) of **SUAVAL Group**, is intended to reflect and preserve the conduct high standards that have been and are part of our culture and way of doing business. At **SUAVAL Group** we are committed to fully comply with the laws and regulations that affect our organization and the way we operate. This **CODE**'s ethical standards are closely linked to the strategies, values and the corporate vision, and are intended to provide guidance and be of equal application to all managers, directors, employees and other persons acting on **SUAVAL Group**'s behalf or are linked to our organization.

We also expect that our business partners, suppliers, consultants, agents, distributors, vendors and other representatives will commit to comply with the standards stipulated in this document.

The following aspects must be taken into account when analyzing our **CODE**:

- **This CODE reflects our values.** This CODE reflects our values. The Governing Body and Management of **SUAVAL Group** have approved this document. They take compliance and are firmly committed to implementing the implementation of the CODE in all our operations, at any levels. Any waiver of the provisions of this CODE must be done in writing and have the approval of the Management.
- **This CODE may be modified.** We commit to regularly review and update our policies and procedures. In that case, we will immediately communicate the changes to all members of the organization.
- **The enforcement of the CODE is expected.** All members of our organization are required to comply with all applicable laws and corporate policies, regardless of whether they are expressly mentioned in this **CODE**.
- **We encourage questions.** Feel free to contact the **Compliance Department** if you have any question or concern.
- The actual or potential infringements must be informed. If there is a belief or suspicion that a violation of this CODE has occurred or may occur, the Compliance Department should be notified immediately or use the Channel for Concerns and Irregularities. Failure to report this constitutes, in itself, a violation of this CODE and may result in the application of disciplinary sanctions to the employee.
- **Retaliation is prohibited** No member of **SUAVAL Group** Will suffer reprisals, discrimination or other harmful labor measures for reporting actual or potential violations in good faith.

SUAVAL Group's Governing body has approved and maintains a COMPLIANCE POLICY that operates in a complementary way with the **CODE** and expresses the will and commitments of our organization for the development of plans and compliance systems in our activities.



SUAVAL Group's management appreciates the time and attention you devote to this important issue and your constant support for the commitment our company has made towards compliance.



Guillermo Suárez-Valdés Suárez
Chief Executive Officer
Dirección General

2. WHO SHOULD COMPLY WITH THIS CODE?

All members of our company (employees, managers, representatives) are expected to read and understand this **CODE**, abide by these standards in their daily activities and assume personal responsibility for complying with this **CODE** and all policies and corporate procedures. Applicable.

Our business partners, suppliers, consultants, agents, distributors, vendors and other representatives are also expected to comply with the standards stipulated in this document. In addition, in many cases, we will request in writing the acceptance of this **CODE**.

3. DISCIPLINARY REGIME IN CASE OF NON-COMPLIANCE

Those who violate this **CODE** may suffer **immediate disciplinary actions**, including the end of the employment relationship, without prejudice to the consequences arising from informing the police/judicial authorities of possible criminal conducts.

CODE violations that involve transgressions of national criminal laws may also result in criminal charges.

The infraction of the obligations of managers and employees reviewed in this Conduct Code, or the infraction of the norms or regulations in the scope of the activities of **SUAVAL Group**, can place the application of the disciplinary regime contained in the Statute of the Workers or in the actual Conventions.

4. LAWS COMPLIANCE

En **SUAVAL Group** nos comprometemos a cumplir las leyes y los reglamentos que afectan a nuestra compañía y a la manera en que operamos. Respetamos los más altos estándares de ética y el cumplimiento de las normas internacionales y esperamos que quienes actúen en nuestra representación se comporten de la misma manera.

At **SUAVAL Group** we are committed to comply with the laws and regulations that affect our company and the way we operate. We respect the highest standards of ethics and compliance with international standards and we expect those who act in our representation to behave in the same way.

According to the Spanish legal framework of the criminal responsibility of the legal entity, this **CONDUCT AND ETHICS CODE** is applicable in the framework of the **PENAL CODE** reform (approved by Organic Law 1/2015, of March 30; in force since July 1, 2015) and in accordance with the current legal system in force regarding Criminal Liability of Legal Persons.

In this sense, we implement the culture of compliance in our organization for the proactive prevention of irregularities and internal control.

This **CODE** is elaborated under the framework of **UNE 19601: 2017** standard, related to the **Penal Compliance Management System**, as the maximum expression by **SUAVAL Group** of our willingness to establish a real and evident compliance culture.

5. LABORAL PRACTICES

5.1. HEALTH AND SECURITY

At **SUAVAL Group** we have assumed the fundamental commitment to **protect the health and security** of our employees and the communities in which we operate. In short, safe operations depend on the proper conduct of all members of **SUAVAL Group**. Our company is committed to taking all necessary actions to prevent injuries and illnesses related to the workplace.

SUAVAL Group workplaces must comply with all relevant health and security standards and be exempt from recognized risks that could cause injury, illness or death.

Employees have the responsibility to carry out their tasks safely and efficiently and pay attention to conditions or practices in the workplace that could create undue risks to people or the environment.

To eliminate possible risks, all **SUAVAL Group** members must immediately report unsafe conditions and correct dangerous actions as soon as possible. Supervisors and employees must immediately report occupational injuries or illnesses, as is specified in our organization's policies and practices and in accordance with national laws.

5.2. EQUAL EMPLOYMENT OPPORTUNITIES

At **SUAVAL Group** we are committed to provide equal opportunities to applicants and employees in all work areas, including hiring, training, promotion and compensation.

We will not tolerate illegal discrimination based on race, religion or belief, age, gender, disability, sexual orientation, nationality or any other condition protected by applicable laws.

All employees have the right to work and participate in activities sponsored by the employer in an environment free of sexual harassment, harassment for ethnic, religious or other reasons, victimization, hostility and intimidation. **SUAVAL Group** policies require compliance with all applicable anti-discrimination laws.

5.3. SUBSTANCE ABUSE

At **SUAVAL Group** we prohibit our members from using, selling, distributing, possessing or promoting illegal drugs and misusing prescription drugs while they are in our company's facilities, as well as working under the influence of illegal drugs or alcohol.

Drugs and alcohol are controlled substances and, at **SUAVAL Group**, we are governed by a zero tolerance policy with members who abuse or are under the influence of these substances while performing their job duties. Those who consume drugs or alcohol while performing their duties can also be reported to the police.

5.4. EMPLOYEE PRIVACY

At **SUAVAL Group** we respect the privacy and dignity of all our members.

We collect and retain the personal information of members that is necessary for the creation and/or fulfillment of the employment relationship or as required by law. Personal information consists on information related to a person who can be identified with that information only or in combination with other information held by **SUAVAL Group**.

Our company uses procedures designed to protect and limit the access to our members' personal information in accordance with the applicable laws governing their privacy.

No **SUAVAL Group** member may access or use records or information of other members, unless that person is authorized to do so. In that case, that person can only do so in accordance with legitimate business needs and with applicable laws.

5.5. THREATS AND VIOLENCE

SUAVAL Group members security is very important.

Our members cannot do violence acts or other intentional acts aimed at harming other people or property in the company's facilities. Similarly, employees may not, in the workplace, make intimidating or threatening comments or behave in a manner that implies a threat to the personal security or property of another person.

Harassment, violence or threats of violence should be reported immediately, in accordance with the guidelines in this **CODE**.

At **SUAVAL Group** we prohibit, in the installations of our organization, in the properties that we rent and/or of which we own, the possession, concealment, use or transfer of firearms or other type, including knives, clubs, explosives or other devices that are primarily used to cause damage.

6. COMMERCIAL, ACCOUNTING AND FINANCIAL REPORTS PREPARATION

At **SUAVAL Group** we try to maintain accurate and reliable corporate records that comply with applicable accounting standards and established internal controls

Payments of money, transfers of goods, provision of services or other transactions on behalf of **SUAVAL Group** are not approved without proper supporting documentation or are not made when it is understood that part of those payments are used for purposes that are not described in the documentation.

No active or disclosed funds can be established. Or not registered for any purpose

Transactions in black are strictly prohibited, regardless of their magnitude.

SUAVAL Group members do not attempt to influence, confuse or interfere with internal or external auditors who are hired to perform audits of accounting books, records, procedures or internal controls of the company's business.

All **SUAVAL Group** members must:

- Present in a reasonable way (accurate, complete, objective, relevant, timely and understandable) financial information and other information that is relevant to the financial statements, in accordance with applicable laws and regulations.
- Respect, supervise and improve **SUAVAL Group** processes to maintain effective internal control of financial reports.
- Act in good faith, with care and in a responsible, competent and diligent manner; use well-founded, professional and independent criteria and try to present relevant information reasonably available in a timely manner to the Management and other managers in accordance with the general accounting policies of **SUAVAL Group**.
- Protect the confidentiality of the information obtained at work and use the confidential information obtained at work only for **SUAVAL Group** commercial purposes and not for personal gain or enrichment.

7. CAPITAL BLANKING PREVENTION AND TERRORISM FINANCING

At **SUAVAL Group** we comply with the legality to prevent capital blanking and terrorism financing. We have determined not to establish relationships with people or entities that do not comply with the aforementioned legislation or that do not provide adequate information in relation with the compliance with it.

8. INTEREST CONFLICT

Whenever you act as an employee or other representative of **SUAVAL Group**, you must make your decisions in the best interest of our company. A conflict of interest exists when your private interests interfere, in some way, with the interests of the organization

For example, there may be an interest conflict in the following cases

- When you take action or have interests that may hinder the objective and effective fulfillment of your duties at **SUAVAL Group**.
- If you or your family members receive improper personal benefits, such as cash, loans, loan guarantees or improper gifts, due to your position at **SUAVAL Group**.
- If you work for a competitor, customer or supplier of **SUAVAL Group** or have a significant financial interest in them. **SUAVAL Group** employees may not work for a competitor or serve as advisors or board members of a competitor. As a best practice, you should avoid maintaining direct or indirect business relationships with customers, suppliers or competitors of our organization, unless you do so on behalf of the organization. This provision does not include minor or non-relevant shareholding in a publicly traded competitor.
- When managers have financial interests or other jobs or managerial positions that may conflict with **SUAVAL Group** interests or prevent them from performing their work effectively. In those cases, managers are expected to disclose the corresponding information to the managers board and refrain from making decisions related to that potential conflict

Our CODE prohibits interest conflicts. However, we recognize that it is not always easy to determine if there is an interest conflict.

Questions should be directed to *SUAVAL Group* Compliance Department. Conflicts or possible conflicts must be reported in accordance with the procedure indicated in Section 8 of this CODE.



9. DONATIONS POLICY, HOSPITALITY AND SIMILAR BENEFITS

This **POLICY** constitutes a minimum compliance standard, applicable to all employees, others and **SUAVAL Group** business partners.

At **SUAVAL Group** we have a **zero tolerance** towards bribery and we are committed to act professionally, impartially and with integrity in all our activities wherever we operate

Accepting gifts, courtesies and other benefits can be a legitimate way to foster good business relationships, but it is important that they **never** be used to unduly influence decision-making processes or make others perceive that there was an illicit influence.

Accepting gifts, courtesies and other benefits should always be done in accordance with the law and business practices of the place.

It is important to take all possible precautions when gifts, courtesies and other benefits are accepted, to protect the reputation of others and **SUAVAL Group** against allegations of illegal conduct and to ensure that they do not violate the anti-bribery regulations.

In general, gifts, courtesies and other benefits should not be requested from any person with whom **SUAVAL Group** does business, including suppliers, customers, business partners and government officials.

9.1. OBLIGATIONS OF SUAVAL GROUP EMPLOYEES

- They must ensure to read, understand and comply with this **POLICY** and any additional information issued in relation with it.
- The prevention, detection and reporting of bribes is the responsibility of all those who work for **SUAVAL Group** or under **SUAVAL Group** control. Each employee is required to avoid any activity that might suggest or lead to a violation of this **POLICY**.
- Any irregularity that is detected or suspected as soon as possible should be notified through the **Non-Compliance and Irregular Channel** of **SUAVAL Group**, if it is considered that there has been a violation of this **POLICY** or that it may occur in the future. *For example, if a supplier or potential supplier offers you something to gain a competitive advantage from **SUAVAL Group** or a customer indicates the need for a gift or payment to secure a business.*

9.2. GIFTS, OBSEQUIES, COURTESIES AND OTHER BENEFITS TO OTHER PEOPLE

Gifts and commercial invitations are widely accepted in the day-to-day business and commercial activity. Giving or receiving invitations or promotional expenses are considered acceptable if they are:

- Related to events related to the commercial activity.
- Offered and received in good faith.

- Allowed under local laws and customs.
- Offered and received in accordance with the procedures described by the organization

However, commercial invitations of considerable value can also be used as a cover for bribery.

Gifts, courtesies and other benefits offered to others (government officials, customers or suppliers) must:

- Be reasonable and habitual for the circumstances.
- Not be motivated by the desire to improperly influence the government official, client or supplier.
- Be in accordance with the standards of professional courtesy generally accepted in the country where it is offered and in the country in which **SUAVAL Group** has our main offices.
- Offer yourself in an open and transparent manner.
- Offer in good faith and without expectation of reciprocity.
- Offer in relation to a holiday or event in which they usually exchange presents, in the case of gifts.
- Offer in relation to a legitimate business purpose and in good faith, in the case of travel and courtesies.
- Do not offer to any government official, client or supplier with a regularity or frequency that generates an inappropriate perception or that distorts the purposes of this **POLICY**.
- Comply with local laws and regulations that apply to the government official, customer or supplier.

9.3. ACCEPT GIFTS, OBSEQUIES, COURTESIES AND OTHER BENEFITS

At **SUAVAL Group** we **DO NOT** allow the use of gifts that:

- Can influence business relationships, either with customers or with suppliers, so that any advantage, difference in treatment, business expectation, influence or obligation (direct or indirect) of contracting with them is created.
- May affect the professional activity of **SUAVAL Group** employees so as not to carry out their work independently and objectively, in the most favorable way for **SUAVAL Group** interest.
- Are contrary to any legislation, regulation and/or regulations, whether external and general or internal and own **SUAVAL Group**.

Other complementary guidelines, also mandatory with respect to the acceptance of gifts by **SUAVAL Group** employees and executives are the following:

- It is forbidden to accept personal financial assistance of any kind provided by others, except that it comes from a financial institution acting in its ordinary activity and with not exceptional or singular criteria.



- It is forbidden to accept cash.
- It is not allowed to accept leisure trips or any kind of attention for the employee and/or any family member, who are paid by others with direct or indirect economic relations with **SUAVAL Group**.

Any attempt to bribe must be communicated and reported through **the Breaches and irregularities Channel**.

10. CONFIDENTIALITY, USE OF COMPANY ASSETS, INFORMATION AND TECHNOLOGY

10.1. CONFIDENTIALITY

The protection of confidential information is fundamental to the **SUAVAL Group** success, including confidential information about the members, customers and suppliers of our organization.

Several aspects of our business that allow us to compete effectively are based on information: our products, our plans and our strategies to serve customers and meet their needs

Our information assets may include, for example:

- Customers names and their product needs.
- Patents, trademarks, licenses and other types of intellectual property
- Knowledge (know-how) and trade secrets, including, for example, registered equipment, suppliers (of equipment and raw materials) and product formulations.
- Future business ideas and concepts.
- The characteristics of a non-launched product, programs and launch strategies.
- Passwords to access to the network and systems.
- Database extraction rights.
- Financial data not available to the public.
- Information about acquisition and business.
- Production, marketing and sales forecasts.
- Pricing and sales strategies.
- Sellers, suppliers and terms of the **SUAVAL Group** agreements with them.
- Prices of goods, materials and services purchased.
- Employee registration.
- Organization charts and organizational changes.
- Operational strategies.
- Security procedures.
- Any other information that has value, provides competitive advantages and, in general, is not available to the public.

We entrust confidential business information to our members and partners so that they can carry out their work successfully. This confidential information is owned by **SUAVAL Group** and it is only used for corporate purposes. Maintaining the confidentiality of registered business information and trade secrets is essential to achieve success and growth, as well as to maintain our reputation and relationship with customers, sellers, suppliers and business partners.



We promise to protect confidential information in any format. Confidential information may be presented or stored in various formats, including, for example, printed documents, cloud storage services, emails, voicemails or recordings, Skype messages, faxes, information on hard drives and other storage devices. electronic, tables and graphic presentations and audio and video tapes.

*The obligation to preserve confidential information continues even after the end of the employment relationship with **SUAVAL Group**.* If you decide to stop working for our company, you cannot disclose confidential information to others.

10.2.SUAVAL GROUP OPPORTUNITIES AND ASSETS

SUAVAL Group members have a duty to promote the legitimate interests of our organization when the opportunity presents itself. Consequently, they cannot:

- Take advantage of the opportunities that arise in work for **SUAVAL Group** or through the use of goods or information from **SUAVAL Group**.
- Use **SUAVAL Group** assets, information or charges to obtain improper personal benefits.
- Borrow or use the name, assets, commercial reputation, funds, data or other assets of **SUAVAL Group** for your benefit or for the benefit of others.
- Use **SUAVAL Group** assets for illegal or improper purposes.

Because theft, negligence and waste have a direct impact on the profitability of our company and may violate local laws, **SUAVAL Group** members are expected to ensure that corporate assets are used only for legitimate business purposes. At the end of the employment relationship, all records and equipment of **SUAVAL Group** must be returned in accordance with the contractual terms and applicable laws.

The Compliance Department should be immediately informed of suspected fraud or robbery.

10.2.1. No records divulgation

At **SUAVAL Group** we are committed to preventing the misuse of the information contained in the corporate records.

Owing to the information about our organization's operations can be disseminated quickly and easily (for example, by email), **SUAVAL Group** members must take precautions to prevent unauthorized or unnecessary dissemination of crucial and recorded information.

Access must be made only for commercial purposes and for the need to know. Information about clients and employees in the corporate files is not disclosed outside of **SUAVAL Group** without the permission of our company and the client, except in the case of judicial subpoena, other legal proceedings or requests from government investigators or regulatory entities, under the approval of the Compliance Department.

10.3.IDEAS AND NEW PRODUCTS OWNERSHIP

Employees who develop ideas, products or services while working for **SUAVAL Group**, with the help of corporate resources (such as materials, information, equipment, technology or **SUAVAL Group** facilities), do so with the understanding that These elements are the exclusive property of SUAVAL Group within the framework established by law.



11. EMAIL CORRECT POLICITY USE

11.1. INTRODUCTION

Email has become the main internal and external communication channel for companies. Therefore, in this section we define how we should use the email from **SUAVAL Group** and how we should communicate with our customers, suppliers, partners and other collaborators.

11.2. NORMATIVE

This regulation affects both domain email accounts **@suaval.com** or **@wanner.es**, as well as to those particular email address messages (@gmail.com, @hotmail.com, @yahoo.com, etc.) addressed to **SUAVAL Group** or related to **SUAVAL Group**. As an employee of **SUAVAL Group** you should note that:

- Each email account **@suaval.com** o **@wanner.es**, is strictly professional and associated with a person responsible. Therefore, you should not use your **SUAVAL Group** email account to send, forward or receive personal emails.
- You should not send or forward messages that threaten the safety and integrity of customers, suppliers, colleagues and other employees of **SUAVAL Group**. It is prohibited to send or forward derogatory, deceptive or false messages that attack or abuse clients, suppliers, colleagues or other **SUAVAL Group** employees.
- You must not disseminate confidential information or disclose information that discredits or may harm **SUAVAL Group**.
- You should not send, forward or receive emails that are larger than 24 MB (including all attachments in the message). In the case of including heavy attachments in the email, you must have previously compressed them in some known format (such as .zip), provided that the matrix file allows the use of a compression algorithm, especially in the case of previously compressed native formats (.jpg, .pdf).
- You must inform the **person responsible** for the receipt of spam mail, unsolicited mail, mail of doubtful origin (from unknown or malicious users) or mail with viruses.
- You must be responsible for keeping your email cleaned to avoid saturation of your mailbox, as well as saving the information of your email that you consider important, following the indications and the means provided for it by **SUAVAL Group**. You must not send, receive, download, copy or execute videos, music, graphics, or other files unrelated to **SUAVAL Group** activity.
- You should not use email in a way that interferes with the normal development of your work at **SUAVAL Group**.
- Those who do not use their email account correctly can be sanctioned according to the organization's CONDUCTE CODE.

11.3. EMAIL ACCOUNT

A **SUAVAL Group** email account is as follows:



- An electronic address with the form `user@organizacion.com`
- A mailbox to store messages.
- A password to access the account privately.
- The possibility of sending and receiving messages within **SUAVAL Group** and to the internet using the assigned electronic address.

The email account is personal and non-transferable, so you must have secure passwords and the account cannot be shared. Working groups (projects) that have an account assigned must name an authorized user to manage it. Each person, or the authorized user, is responsible for the security of their account and password. The first time the user receives their email account, they must change their password. For security, the password must be changed at least every three months.

To report problems, make suggestions or make any request that relates to email accounts or the email service in general, a call must be made or a communication sent to the IT manager.

It is the responsibility of each user to have backup copies of the messages in their mail folders and in their email address book.

11.4. EMAIL USE

- **It is an institutional rather than personal email. Therefore, it should be used for institutional matters, not personal; external to the institution and the functions and responsibilities granted by it.**
- **Use appropriate language in your messages.**
- **The mail has no guarantee of being private. Remember that there are people who are dedicated to trying to "capture" Internet information, therefore, never put in an email message information that you would not put in a letter.**
- **All shared and communicated information in this medium must respond to the values of responsibility, honesty, respect, loyalty and tolerance.**
- **The massive sending of mails is authorized only to assigned personnel.**
- **As personal identification it will be used only for the institution's own means. Not being authorized to subscribe with him to any medium, page, blog, social networks, etc., unless they are exclusively necessary for the realization of his work (chambers of commerce, institutional organizations, platforms of suppliers and customers, etc.)**
- **Misuse of these rules will result in a penalty. Each user is responsible to the institution for its use and, therefore, assumes and accepts the sanctions that the institution applies in relation to this matter.**
- **All users are in solidarity with the institution, so they must notify of any violation of this regulation or the malfunction of the mail to the Information Technology Manager, in order to contribute to its proper use, as well as to disclaim responsibilities.**

- **Users must not read outside email or generate or send emails on behalf of another person without authorization or impersonating it.**
- **Rights violations of any person or institution protected by copyright, patents or any other form of intellectual property are prohibited. Among other activities, software distribution or installation is included without the *SUAVAL Group* license.**
- **Do not reveal your account code or allow its use to others for activities outside *SUAVAL Group*. The ban includes individuals.**
- **The use of e-mail is prohibited in order to perform some type of harassment, defamation, slander, with the intention of intimidating, insulting or any other form of hostile activity, regardless of language, periodicity or size of the message.**
- **It is prohibited to carry out activities that contravene the systems security or generate network or services interruptions. Among the actions that contravene the security of the network are (although not limited by them) accessing data whose recipient is not you, logging into an account of a server or an application for which you are not authorized. For the purposes of these policies, the word "interruption" includes, but is not limited to, capturing network traffic, flooding the network, packet spoofing, denial of service (DoS) attacks or falsifying routing and routing information. configuration of the equipment with the objective of exploiting some systems vulnerability.**
- **Users have the obligation to report any irregularity or abuse of these services to the IT Manager, to prevent this from happening again or to other users.**

12. CORRECT INTERNET USE POLICY

12.1. INTRODUCTION

This Policy purpose is to establish standards that ensure the proper functioning of the Internet.

Employees are expected to use the Internet responsibly and productively. Internet access is limited to work-related activities only and personal use is not allowed.

12.2. GENERAL NORM

SUAVAL Group makes available to its workers and collaborators different computer tools that should be used for professional purposes.

12.3. BAD INTERNET USE

Unacceptable use of the Internet by members of the organization includes, but is not limited to:

- Access to pages of illicit content or that attempt against human dignity: those that carry out an apology for terrorism, pages with xenophobic, racist, or anti-Semitic content, etc.
- Use computers to perpetrate any form of fraud, and/or hacking of software, movies or music.
- Chats will not be allowed at any time, except for the chat authorized exclusively by **SUAVAL Group** for internal communications, except that used for (corporate) purposes of internal communication and for lawful purposes.
- Steal, use or discover the password of other employees without authorization.
- Share confidential material, trade secrets or proprietary information outside the organization.
- Send or publish defamatory information for the company, its products / services, employees and/or customers.
- Introduce malicious software in the company's network and/or jeopardize the security of the organization's electronic communication systems.
- Send or publish chain letters, requests or announcements not related to the organization purposes or activities.
- Pass personal opinions as a representation of those from the organization.
- The user must not install any program to play MP3, RA, WAV or Internet radio stations.
- Any type of transmission via Internet that is not authorized (listening to music and watching video) is prohibited.
- Employees should always communicate with education and respect, being professionals. Post comments or send derogatory, misleading or false messages.
- Post comments or send anonymous or pseudonymous messages. Employees must always use their real name and identify themselves as **SUAVAL Group** workers/collaborators.
- Create a group, page, blog, etc. to mention **SUAVAL Group**, without prior approval.

- Use social media in a way that interferes with the normal development of their work at **SUAVAL Group**.

If an employee is not sure what constitutes acceptable use of the Internet, he must contact to the **IT Manager**.

12.4.SANCTIONS FOR INTERNET BAD USE

Computers that have Internet can be audited in order to verify the proper use of this.

Misuse of these rules will result in a penalty. Each user is responsible to the institution for its use and, therefore, assumes and accepts the sanctions that the institution applies in relation to this matter.

13. RIVALRY AND EQUITABLE TRADE

In general, antitrust and competition laws prohibit agreements or dealings between actual or potential competitors to set or control prices, manipulate bids, boycott specific suppliers or customers, limit production and sales of product lines or assign markets and / or customers. Other laws prohibit controlling the resale price of distributors and merchants, discrediting a competitor, making false statements about the company's products, stealing trade secrets or offering or paying bribes or kickbacks.

These laws are strongly demanded and their breach could lead to significant fines for **SUAVAL Group** and its members, as well as their imprisonment.

In accordance with our policy, we will compete vigorously, but fairly, and comply with all applicable antitrust and antitrust laws and regulations.

As a general rule, **SUAVAL Group** members are prohibited from discussing non-public information with competitors and suppliers, including members of trade associations, such as the following topics:

- Pricing policies, discounts, earnings, credit terms.
- Other sale conditions and/or purchase of goods or services.
- Geographical areas of operation or sales.
- Production or sales quotas.
- Customer assignments and tenders for jobs or contracts.

Questions about the relevance of proposed or actual contacts with competitors that include these issues should be directed to the **Compliance Department**

This **CODE** prohibits stealing registered information, obtaining trade secrets without the consent of the owner or inducing the disclosure of information registered by previous or current employees of other companies. In addition, these actions are, in general, illegal.

We must all respect the rights of customers, suppliers and competitors of **SUAVAL Group** and relate to them fairly. No one, in the course of their **SUAVAL Group** work, can unfairly benefit from

other people through manipulation, concealment, abuse of confidential information, false statement of relevant facts or other unfair intentional practices.

14. ENVIRONMENTAL ISSUES

We must all respect the rights of customers, suppliers and competitors of SUAVAL Group and relate to them fairly. No one, in their work, may unfairly benefit from other persons through manipulation, concealment, abuse of confidential information, false statement of relevant facts or other unfair intentional practices.

Our products and our operations respect environmental laws and regulations and permit requirements for atmospheric emissions, land and water discharges and the management, treatment and disposal of chemical substances, including hazardous waste.

From **SUAVAL Group** we are committed to fully comply with all applicable environmental laws and regulations. Employee work practices must respect these laws and regulations and the policies and procedures of our organization adopted to achieve this objective.

In addition, it is **SUAVAL Group's** policy to minimize or eliminate the adverse environmental impact of our products and operations and to implement programs to ensure that our activities meet or exceed legal requirements.

Questions or concerns about the applicability of environmental laws or regulations to proposed work practices or actions should be directed to the Compliance Department in accordance with the procedure indicated in section 14 of this CODE.

15. DONATIONS AND SPONSORSHIPS

At **SUAVAL Group** we make sponsorships and donations, that is, voluntary subsidies, without expecting any compensation, only within the respective legal framework and according to the internal provisions in force for it.

We make donations for social matters. We make them to non-profit institutions or those that are authorized to receive donations through special regulation.

Donations must be made transparently. The objective, the recipient of the donation and the confirmation of acceptance by the recipient are documented and verifiable. No **SUAVAL Group** member promotes donations that may damage the reputation of our organization.

Employees who want to promote sponsorship must first contact to the company responsible entities.

16. RESPONSIBILITY AND DUTIES

16.1. ADMINISTRATION ORGAN

The Management Body of **SUAVAL Group** has a clear and inalienable commitment to the culture of compliance and ethics in the way of doing business.

To do this, it has provided the following actions:

- It has approved a **COMPLIANCE POLICY**, which complements this **CONDUCT CODE**, which expressly prohibits any type of criminal behavior.
- It has approved this **CONDUCT CODE** as an extension of what is stated in the **COMPLIANCE POLICY**, which aims to serve as a reference guide and mandatory guidance for all members of our organization.
- It has had the necessary resources for the effective operation of the **Criminal and Anti-Bribery Compliance Management System** of our organization.
- Periodically review the evolution of the System and its effectiveness, as well as the necessary improvements to be undertaken.
- Periodically receive information about the operation and incidents of the System.

16.2. MANAGEMENT

In pursuance of the **SUAVAL Group COMPLIANCE POLICY OF BRIBERY AND CRIME PREVENTION**, complying with the law and in accordance with the current legal system in force regarding Criminal Liability of Legal Entities, the Administration Body and Management:

- Establishes, defends and promotes as one of the **SUAVAL Group** fundamental values that the actions of our members are always in accordance with the legal system, in general, and the criminal, in particular, promoting an adequate culture of compliance, complying and enforcing the will expressed by the organization.
- It ensures the establishment of mechanisms to specify the will of **SUAVAL Group** expressed in the **COMPLIANCE POLICY OF BRIBERY AND CRIME PREVENTION** and

in this **CONDUCTE CODE** through the correct adoption, implementation, maintenance and continuous improvement of our Penal Compliance Management System and through clear and defined procedures, policies and processes designed to prevent and detect crimes or to significantly reduce the risk of its commission, in accordance with **UNE 19601: 2017**, in the specific framework of the risks arising from our activities.

- Provides the **Penal Compliance Management System** with adequate and sufficient financial, material and human resources for its effective operation.
- Periodically examines, at least once a year, the effectiveness of the **Penal Compliance Management System**, modifying it, if necessary, when serious breaches are detected or changes occur at **SUAVAL Group**, in its control structure or in the developed activity.
- It ensures that the necessary resources planned for the correct operation of the System are available and used effectively.
- It establishes internal processes to encourage the participation and denunciation of any act or conduct that may be suspicious or criminal, articulating mechanisms to protect any **SUAVAL Group** member that collaborates in this task from any type of retaliation, discrimination or sanction for this reason.
- Aware of the objective complexity and the permanent change of context, the **SUAVAL Group** MANAGEMENT is committed to the continuous improvement of our **Compliance System**, encouraging all organization members to participate with their proposals and suggestions that may improve the ethical performance of our company.

16.3. COMPLIANCE DEPARTMENT

It assumes the functions and responsibility of the **Penal Compliance Body**, it is composed of two people, which together will constitute the **COMPLIANCE DEPARTMENT**, which is entrusted with the supervision of the operation and execution of the **Penal Compliance Management System**, being responsible for:

- Promote and continuously monitor the **Penal Compliance Management System** implementation and effectiveness.
- Ensure that all members of our organization are trained regularly through ongoing training support.
- Promote the inclusion of penal compliance responsibilities in job descriptions and performance management processes of **SUAVAL Group** members.
- Implement a penal compliance information and documentation system.
- Adopt and implement processes to manage information, such as complaints and/or comments received through the **Non-Compliance and Irregularities Communication Channel**.
- Establish performance indicators and measure penal compliance performance.
- Analyze performance to identify the need for corrective actions.
- Identify and manage criminal risks, including those related to business partners.
- Ensure that the **Penal Compliance Management System** is reviewed at planned intervals.
- Ensure that employees are provided access to compliance resources.

The **Compliance Department** is supported by a specialized external Consultant, in order to improve its capabilities and thereby demonstrate:

- Integrity and commitment to penal compliance.
- Effective communication skills and influence capacity.
- Capacity and prestige so that the councils and guidelines have acceptance.
- Competence and necessary knowledge.

The **Compliance Department** epitomizes the position of maximum guarantor of the supervision, surveillance and control of the obligations of criminal compliance at **SUAVAL Group**, so it has sufficient resources and has the powers, adequate status, authority and independence.

16.4. COMMON DUTIES AND OBLIGATIONS

In order to prevent or, where appropriate, detect any irregular conduct that could take place at any of the hierarchical levels, it is the duty of all **SUAVAL Group** members to inform and report, through the procedures developed by our organization, the possible risks or breaches of the law, the **CONDUCT CODE**, any other internal regulations or action protocol implemented and/or any action that could be considered unlawful or criminal.

All **Department/Area Managers** must ensure that the members assigned to their Department/Area are knowledgeable and apply the provisions of this **CODE**, as well as the processes, procedures and/or policies related to compliance that may affect them.

17. QUESTIONS AND DOUBTS

Do not hesitate to contact **SUAVAL Group Compliance Department** if you have any questions or doubts about the application of this **CODE** to your tasks

If you have any questions or become aware of possible violations of the **CODE** or the Company's policies, you **must** report them to the **Compliance Department**.

Our Compliance Department is formed by:

- **Name and surname:** Elisa Villar Rubio
- **Mail:** evillar@suaval.com
- **Telephone number:** +34 985522180

- **Name and surname:** Sergio Ordóñez Fernández
- **Mail:** sordonez@suaval.com
- **Telephone number:** +34 687 170 786

18. COMMUNICATION OF BREACHES AND IRREGULARITIES

We have established procedures for:

- The **confidential and anonymous** presentation of communication of breaches and complaints in good faith by the members, interest groups and business partners of **SUAVAL Group** and others regarding violations of this **CODE** and the **POLICY**.
- The reception, retention and handling of complaints that we receive in **SUAVAL Group** about violations of this **CODE**.

Please note that actual or potential violations must be reported. Do not report them may result in disciplinary sanctions.

CONTACT INFORMATION

MANAGER

- Name and surname: Guillermo Suárez-Valdés Suárez
- Telephone number: 985522180

COMPLIANCE DEPARTMENT

- Name and surname: Elisa Villar Rubio
- Mail: evillar@suaval.com
- Telephone number: +34 985522180

- Name and surname: Sergio Ordóñez Fernández
- Mail: sordonez@suaval.com
- Telephone number: +34 687 170 786

DEPARTAMENTO JURÍDICO

- Name and surname: Marta Nevares Moro
- Mail: mnevares@suaval.com
- Telephone number: +34 629 739 385

COMPLAINT CHANNEL

Organization website:
https://suavalgroup.intedyacloud.com/canal_denuncias