Corporación Masaveu

Catalog of prohibited behaviors and expected behavior parameters

Corporación Masaveu

Contents

1. Introduction

The list below includes actions or conduct whose performance or execution is prohibited, both for the Group's management staff and employees in general, as well as for third parties, suppliers and subcontracted companies that lack internal procedures or codes of conduct equivalent to those implemented in the Group.

These prohibitions are intended to avoid a possible criminal prosecution of both the Group and its employees in the development of their professional or work activity.

Consequently, the execution of the conducts detailed below is prohibited, even when they are carried out in the name and on behalf of the Group and even when a direct or indirect benefit or benefit is sought for the Company.

2. Scope

This catalogue of prohibited conduct is applicable to all senior managers, managers, workers, and, in general, to all persons who provide their services in the Corporación Masaveu Group (hereinafter, the "employees" or "employees of the Corporación Masaveu Group"), regardless of the legal modality that determines their employment or service relationship, the position they occupy in the organisational structure of the Corporación Masaveu Group or the geographical place in which they carry out their work.

It will also apply to third parties, suppliers and subcontracted companies that do not have internal procedures or codes of conduct equivalent to those implemented by the Group.

It is the responsibility of the above-mentioned persons, whatever their role within the Group or its companies, to ensure that this Catalogue is respected and complied with.

3. Rules applicable to the catalogue of prohibited conduct

The Group's Catalogue of Prohibited Conduct will be regulated, in addition to the laws applicable at any given time, by the provisions of the Code of Conduct, and, where appropriate, by the specific internal implementing rules thereof.

4. Definitions

For clarification purposes, the following definitions are made:

- Employees of the Group: All senior managers, managers, workers, and, in general, all the people who provide their services in the Masaveu Corporation Group, regardless of the legal modality that determines their employment or service relationship, the position they occupy in the organizational structure of the Masaveu Corporation Group or the geographical place in which they carry out their work.
- Related persons (or business partners): Any party, other than employees, with whom the Group maintains or intends to establish any type of collaborative or business relationship. By way of example, but not limited to, external advisors, consultants, suppliers of goods or services, contractors, intermediaries, etc. The term "Business" must be interpreted in the broad sense, referring to those activities that are fundamental or beneficial to the purpose of the Group's existence.

5. Catalogue of prohibited behaviours and expected behaviour patterns

This catalogue of prohibited conducts is not exhaustive, and there may be other conducts contrary to current legislation, the performance of which is also prohibited. The list will be updated periodically by the Regulatory Compliance Unit and employees will have it at their disposal for consultation.

5.1. Crimes of corruption in business (between individuals)

Introduction and legal reference

Article 286 bis of the Spanish Penal Code punishes the conduct of any natural person who, by himself or through an intermediary, engages in conduct tending to unduly favor another in the acquisition or sale of goods and services, or is the object of this type of conduct.

Articles 286 ter and 286 quarter and 288 of the Spanish Penal Code regulate the offences of corruption in international transactions, relating to offering or delivering an undue benefit or advantage to public officials in order to obtain favourable treatment in the performance of international economic activities.

For the purposes of this article, a public official shall be understood to be those determined by Articles 24 and 427 of the Spanish Criminal Code.

The aforementioned Crimes contemplate not only an active aspect of commission ("whoever, by himself or through an interposed person, promises, offers or grants...") but also its passive aspect ("whoever, by himself or through an interposed person, receives, requests or accepts...").

In this sense, it is inconsequential that these activities take place outside working hours or outside the Group's facilities.

Likewise, it is also inconsequential whether these acts are carried out in Spain or abroad.

In addition, it must be taken into consideration that since there is no economic scale in our Penal Code that serves to differentiate what can be considered justified as an expense of courtesy or socially admitted attention from what could constitute an act of committing a crime of corruption in business, it is necessary to be prudent and restrictive in this type of offer or receipt of attention, avoiding any of them that may be suitable (or perceived as suitable) to generate a moral obligation to return or alter impartiality in decision-making (for example, offering/accepting a gift or invitation to/from a supplier, customer or any third party, in order to award a contract or close a commercial agreement, etc.).

Aggravated penalties are established when the aforementioned acts or conduct are of particular gravity, being considered, in any case, when: a) the benefit or advantage has a particularly high value b) the action of the perpetrator is not merely occasional c) it is an act committed within a criminal organization or group d) the object of the business is related to humanitarian goods or services or any other of primary necessity.

For more information, you can consult the legal text that refers to the conducts commented directly in the current Spanish Criminal Code [BOE.es - Agencia Estatal Boletín Oficial del Estado].

Prohibited conduct

- Receiving, requesting or accepting an unjustified benefit or advantage of any nature, for oneself or for a third party, by oneself or through an intermediary, as consideration for unduly favoring oneself in commercial relations.
- Offering, promising or granting any undue benefit or advantage, pecuniary or otherwise, by itself or through an intermediary, to a public authority or official or responding to its requests in this regard, in order to obtain a competitive advantage for the Group.
- Failing to comply with the obligations imposed by the Group in the acquisition or sale of goods, in commercial relations or in the contracting of any service or purchase of securities.
- Accepting or requesting, directly or through intermediaries, a benefit or advantage of any kind by the salespeople, administrators, managers or employees of an entity or company (or for their family members) in order to favour them over third parties in the acquisition or sale of goods, in commercial relations or in the contracting of any service.
- Offering or soliciting, directly or through intermediaries, hidden commissions to/from salespeople, managers, employees or administrators to suppliers with whom you intend to contract.
- Failing to comply with the Code of Conduct and the corporate policies that develop it.

What is expected of the Group's employees and related persons

Who refrain from accepting or offering gifts, invitations or advantages of any kind (except those that are within the limit of the criteria determined in the Code of Conduct and the Corporate Policy against corruption and fraud), whose objective is to obtain contracts and/or business artificially.

In this regard, they are required to comply with the principles set out in the aforementioned regulations in order to minimise any possible risk, and it is of particular importance that, prior to any contractual relationship, employees who enter into contracts adequately verify the qualification and integrity of such third parties and proactively ensure that such third parties act in accordance with the Code of Ethics and Conduct.

In the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.2. Bribery crimes

Introduction and legal reference

Articles 419, 420, 421, 422, 423, 424, 427 and 427 bis of the Spanish Penal Code punish both the request or receipt of gifts and hospitality or remuneration by an authority or public official aimed at carrying out or accelerating certain acts, or hindering others. Offering or delivering to officials, authorities, bodies and public administrations a gift or compensation, economic or of any nature, with the intention of obtaining a benefit for the legal person, whether lawful or illegal.

The Spanish Penal Code punishes bribery both from its passive aspect (i.e., conduct of soliciting or receiving gifts and hospitality or remuneration by an authority or public official) and from its active aspect (i.e., practices of accepting or offering attention, gifts and/or remuneration to an authority or public official) in order for said authority to perform, omit or delay an action contrary to its position or function for the benefit of the individual who delivers or offers the gift or a third party, the active aspect of commission being the modality to which commercial companies, i.e. the Group, would be most exposed.

Thus, in the field of private enterprise, it is the conduct of offering that tends to be deserve special care, regardless of whether the official who receives them is also subject to criminal sanctions.

Likewise, it is also inconsequential whether these acts are carried out in Spain or abroad. Among the suitable conducts for the purposes of this criminal type would not only be economic offers, hospitality and gifts, but also the hiring of people close to the recipient of the act of corruption, in order to generate in him a moral duty of return.

As there is no economic scale in our Spanish Penal Code that serves to differentiate what can be considered socially accepted care from what could constitute an act of corruption, it is essential to be prudent and restrictive in this type of offer, avoiding those that may be suitable (or perceived as suitable) to generate a moral obligation of return and alter impartiality in decision-making.

It is also inconsequential whether the corrupt conduct takes place outside working hours or outside the Group's facilities, or is financed on an individual basis.

When analysing these offences and, above all, the means of commission, it should not only be a matter of concern about the possible commission in a direct manner, but also when third parties (e.g. intermediaries, commercial agents, possible external advisers, etc.) carry out such offences with the authorities or public officials, national or foreign.

The penalties for the commission of this crime can lead to disqualification for ten years from obtaining subsidies and public aid, contracting with bodies or entities that are part of the public sector, and/or enjoying tax and Social Security benefits or incentives.

In order to know the scope of this crime, it is appropriate to indicate that the Criminal Code understands that the following shall be considered a public authority:

- Spanish Deputies and Senators, members of Legislative Assemblies of Autonomous Communities and the European Parliament, officials of the Public Prosecutor's

Office and members of corporations, courts and collegiate bodies with their own command or jurisdiction, and in general terms and for the purposes of this offence, any person who holds a legislative, administrative or judicial office or employment in a country of the European Union or any other foreign country (whether by appointment or by election)
- Any person exercising a public function for a country of the European Union or any other foreign country (including a public body or a public undertaking, for the European Union or for another public international organisation), or
- Any official or agent of the European Union or of a public international organisation.

For more information, you can consult the legal text that refers to the conducts commented directly in the current Spanish Criminal Code BOE.es - Agencia Estatal Boletín Oficial del Estado.

Prohibited conduct

The following prohibitions are applicable to national or foreign authorities and public officials, belonging to the European Union, member countries of the European Union and/or international organizations, or when the offer, promise or concession is made to their relatives and/or close persons.

- Offering, promising or granting to authorities and/or public officials any type of benefit or advantage, of any kind or nature, provided that it does not exceed customary, social or courtesy uses, for the purposes of:
- That the authority and/or public official acts or fails to act in relation to the exercise of his or her public functions, including the performance of an act contrary to the duties inherent to his or her office.
- To achieve or maintain any type of legal business.
- To obtain or maintain a benefit, of any kind or nature, in the performance of economic activities.

What is expected of the Group's employees and related persons

That they do not engage in conduct that can be understood as inducements to lack of impartiality, transparency and rectitude in decisions. of public authorities through the offer or promise of delivery of goods or services (or other similar services), either directly or through Third Parties (through, for example, any external advisor, intermediary or agent or business partner).

To this end, the principles set out in the aforementioned regulations must be complied with in order to minimise any possible risk, and it is of special importance that, prior to any contractual relationship, employees who enter into contracts adequately verify the qualification and integrity of said third parties and proactively ensure that such third parties act in accordance with the Code of Ethics and Conduct.

In the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.3. Influence peddling crimes

Introduction and legal reference

Regulated in articles 428 to 430 of the Penal Code, this Crime consists of influencing a public official or authority by reason of kinship, affinity or personal relationship to achieve a resolution that may generate, directly or indirectly, an economic benefit for myself or for a third party.

It is, therefore, a crime in which, as in bribery, the active or passive participation of an authority or public official is required and whose purpose is to manipulate the decision of the Administration in the exercise of its functions, so it is not uncommon for both crimes to occur jointly.

A public authority is considered to:

- Spanish Deputies and Senators, members of Legislative Assemblies of Autonomous Communities and the European Parliament, officials of the Public Prosecutor's Office and members of corporations, courts and collegiate bodies with their own command or jurisdiction, and in general terms and for the purposes of this offence, any person who holds a legislative, administrative or judicial office or employment in a country of the European Union or any other foreign country (whether by appointment or by election)
- Any person exercising a public function for a country of the European Union or any other foreign country (including a public body or a public undertaking, for the European Union or for another public international organisation), or
- Any official or agent of the European Union or of a public international organisation.

For more information, you can consult the legal text that refers to the conducts commented directly in the current Spanish Criminal Code [BOE.es - Agencia Estatal Boletín Oficial del Estado].

Prohibited conduct

- Influencing a public official or authority by using the personal relationship with him/her, in order to obtain a resolution that may directly or indirectly generate an economic benefit for him/herself or for a third party.
- Acting as an intermediary for a third party, by reason of the personal relationship with a public official, to obtain favorable treatment for that third party, from the public official with whom the personal relationship is held.
- Failing to comply with the rules and procedures regarding contracting, transparency and integrity of the Group.

What is expected of the Group's employees and related persons

That they act with the utmost exemplarity, not abusing their personal relations with the authorities or public officials and, in the event that such relationships of kinship or affinity exist, that they proceed to communicate it as soon as possible for their timely assessment.

In this sense, they are required to comply with the ethical criteria contained in the Code of Conduct in the processes of hiring their own personnel, suppliers and customers, all in order to minimize any possible risk.

In the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.4. Crimes against the Public Treasury, Social Security, Accounting Obligations, Granting of Public Aid and Subsidy and Fraud to the General Budgets of the European Union.

Introduction and legal reference

Articles 305 to 310 bis of the Spanish Penal Code regulate these crimes. Specifically, they punish the following conduct:

- Fraud to the Public Treasury (Articles 305 and 305 bis): Defrauding the Public Treasury (state, regional, regional or local) in an amount greater than 120,000 euros, avoiding the payment of taxes, amounts withheld or that should have been withheld or payments on account of remuneration in kind, unduly obtaining refunds or enjoying tax benefits in the same way.
  The mere filing of returns or self-assessments does not exclude fraud, when it is proven by other facts.
  Aggravated cases are established when: a) The amount of the amount defrauded exceeds six hundred thousand euros b) The fraud has been committed within an organisation or a criminal group c) The use of natural or legal persons or entities without legal personality interposed, businesses or fiduciary instruments or tax havens or territories with no taxation hides or hinders the determination of the identity of the taxpayer or the person responsible for the crime, the determination of the amount defrauded or the assets of the taxpayer or the person responsible for the crime.
- Failure to comply with and falsity of accounting obligations established by tax law (Article 310): The following conducts are penalised: a) Serious failure to comply with the obligation to keep commercial accounts and accounting books and/or records, under the direct estimation of tax bases. b) Keeping different accounts that, referring to the same activity and financial year, hide or simulate the true situation of the company. c) Not recording in the mandatory books businesses, acts, operations or, in general, economic transactions, or having recorded them with figures other than the true ones. d) Making fictitious accounting entries in the mandatory books.
  The consideration as Crimes of the factual assumptions referred to in paragraphs c) and d) above will require that the amount, more or less, of the omitted or falsified charges or payments exceeds, without arithmetical compensation between them, 240,000 euros for each financial year.

- Social Security fraud (Articles 307, 307 bis and 307 ter): Defrauding Social Security, by action or omission, evading the payment of Social Security contributions and joint collection concepts, unduly obtaining refunds or unduly enjoying deductions, in an amount greater than 50,000 euros. The mere presentation of contribution documents does not exclude fraud, when it is proven by other facts.
  Aggravated cases are established when: a) The amount of the defrauded contributions or undue refunds or deductions exceeds 120,000 euros b) The fraud has been committed within an organisation or a criminal group c) The use of natural or legal persons or entities without legal personality interposed, businesses or fiduciary instruments or tax havens or territories with no taxation hides or hinders the determination of the identity of the person liable to the Social Security or the person responsible for the crime, the determination of the amount defrauded or the assets of the person liable to the Social Security or the person responsible for the crime.
  It is also penalised to obtain, for oneself or for another, the enjoyment of benefits from the Social Security System, the undue prolongation of the same, or facilitating others to obtain them, by means of the error caused by the simulation or misrepresentation of facts, or the conscious concealment of facts of which they had the duty to report, thereby causing damage to the Public Administration.
  Aggravated cases are established when: a) the value of the benefits is greater than 50,000 euros b) The fraud has been committed within an organisation or a criminal group c) The use of natural or legal persons or entities without legal personality interposed, businesses or fiduciary instruments or tax havens or territories with no taxation hides or hinders the determination of the identity of the person liable to the Social Security or the person responsible for the crime, the determination of the amount defrauded or the assets of the person liable to the Social Security or the person responsible for the crime.
- Fraud in the granting of public aid and subsidies (Article 308): The following conduct is penalised: a) Obtaining subsidies or aid from Public Administrations, including the European Union, in an amount or for a value greater than 100,000 euros, falsifying the conditions required for their granting by concealing those that would have prevented it; b) In the development of an activity totally or partially paid for with funds from public administrations, including the European Union, applying them in an amount greater than 100,000 euros for purposes other than those for which the subsidy or aid was granted; c) Such conduct is also punishable if the amount obtained, defrauded or improperly applied does not exceed 100,000 euros, but exceeds 10,000 thousand.
  To determine the aforementioned amounts, the total amount obtained, defrauded or unduly applied will be taken into account, regardless of whether it comes from one or more Public Administrations jointly.
- Fraud against the General Budgets of the European Union (Article 306): Defrauding the budgets of the European Union and others administered by it, in an amount greater than 50,000 euros, avoiding the payment of amounts to be paid by giving the funds obtained an application other than that for which they were intended or unduly obtained funds, falsifying the conditions required for their granting or concealing those that would have prevented it.
  The aforementioned conduct is also punished if the amount defrauded or improperly applied does not exceed €50,000, but exceeds €4,000.

In relation to the crimes exposed, it must be taken into account that they can be committed by action or omission, and that the mere presentation of letters of payment or even their payment does not necessarily prevent their commission.

In addition to the rest of the penalties provided, the responsible legal person will be imposed the loss of the possibility of obtaining subsidies or public aid and the right to enjoy tax or Social Security benefits or incentives for a period of three to six years; and the prohibition to contract with the Public Administrations may be imposed.

For more information, you can consult the legal text that refers to the conducts commented directly in the current Spanish Criminal Code BOE.es - Agencia Estatal Boletín Oficial del Estado.

Prohibited conduct

- Failing to pay or failing to withhold the corresponding amounts or amounts due in compliance with the tax regulations applicable to the Group.
- Obtaining tax benefits or undue refunds.
- Failure to make the payment of the corresponding required Social Security contributions.
- Improperly obtaining refunds from Social Security.
- Enjoying undue deductions from Social Security.
- Falsifying the conditions required to obtain subsidies, deductions or aid from public administrations.
- Concealing information that could prevent the granting of a subsidy, relief or public aid.
- Obtaining Social Security benefits for one's own benefit or that of a third party, through the error or misrepresentation of facts or by the conscious concealment of facts about which one had the duty to report, thereby causing damage to the Public Administration.
- Using, validating or accounting for false accounting supports.
- Issuance of any proforma invoice that does not justify the provision of any service.
- Issuance of invoices for an amount greater than the service actually paid.
- Failing to comply with the obligation to keep tax accounts, books or records or the regulations applicable to these purposes.
- Keeping different accounts for the same activity or financial year.
- Not recording in the accounting or mercantile books business, acts, operations or any other economic transaction.
- Obstructing inspection activity.
- In the process of applying for or obtaining the subsidy or public aid, falsifying, altering or omitting any required data or information.
- Failing to comply with or alter in any way any of the conditions provided for or the form of execution of the project for which the subsidy or aid was granted.
- Appearing to comply with the requirements and assumptions required for a Public Administration to grant a subsidy or aid by falsifying data in the application or in the documents that accompany it.
- Using the funds obtained through a subsidy or aid from a Public Administration for purposes other than those for which it was granted (for example, not organising a training action for which the funds had been granted or providing the training

action with a content different from that for which the aid or subsidy was associated).

What is expected of the Group's employees and related persons

That they are especially alert to decisions or operations planned to avoid the tax or socio-labor burden or to obtain subsidies, in situations that may fit into the behaviors described in the previous paragraphs, especially those people who, by their position or position in the Group, have a special duty of care and vigilance, resorting to internal regulations and, when circumstances so advise, to request the appropriate advice from external experts, ensuring that all this is duly documented and filed.

The Group's managers in these areas are expected to act responsibly and adhere to prudent criteria, seeking the appropriate advice from external experts in case of doubts.

In this regard, they are required to respect the Group's internal tax or financial rules, ensuring strict compliance with the processes that develop their contents in order to minimise any possible risk.

Likewise, all of them are expected to ensure that the accounting entries, as well as the taxes in which they derive, reflect the reality and true image of the Group's financial situation, ensuring compliance with the law and complying with their duties of safekeeping and custody of the appropriate supporting documentation.

In the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.5. Crimes against privacy and unauthorized access

Introduction and legal reference

Articles 197, 197 bis and 197 ter of the Criminal Code detail the different types of offences classified as offences in the area of discovery and disclosure of secrets and computer break-ins. Thus, in general terms, those acts that have the purpose of discovering secrets or violating the privacy of another person, without their consent, in order to discover secrets or violate the privacy of another person, without their consent, in order to appropriate information relating to that person, and specifically: seizing, using or modifying, without authorization and to the detriment of a third party, confidential data of a personal or family nature of another that are registered in computer, electronic or telematic files or supports or in any other public or private file or record, illegally accessing a computer system to seize personal data contained therein, in order, therefore, to discover secrets or violate the privacy of another person, without their consent, in order to appropriate information relating to that person.

The punishment of these conducts is also applicable when there is no seizure of data, but there is use, modification or disclosure of the same to the detriment of a Third Party.

It also includes aggravated penalties for cases in which the criminal activity is carried out by the persons in charge of or responsible for the files, computer, electronic or telematic supports, or through the unauthorized use of the victim's data; and due to the nature of the data and vulnerability of the victim, especially punishing the dissemination of personal data that reveal ideology, religion, health, racial origin or sex life, and cases in which the data belong to a minor or incapacitated person.

These crimes can only be committed intentionally.

For more information, you can consult the legal text that refers to the conducts discussed directly in the Spanish Criminal Code in force BOE.es - Agencia Estatal Official State Gazette

Prohibited conduct

- Seizure or search of papers, letters, e-mails or any other documents or personal effects such as diaries, mobile phones, laptops, notebooks, bags, locker keys, or any other work instrument or support.
- Intercepting or intercepting in any way the telecommunications of third parties (telephones, emails, letters, reports, notes, laptops, or any other work instrument or support).
- Use mechanisms or devices to listen, transmit, record or reproduce the sound, image, or any other communication signal of third parties, in order to discover information about them.
- Accessing data or computer programs contained in a computer system or part of it without authorization with the intention of discovering information or providing it to third parties.
- To seize, use, change or modify confidential data of the worker or his or her family members registered in the Group's bases.
- Disclose or transfer to third parties personal or family data of employees to which access is had or that is discovered in any way.
- Divulging to third parties, and without the authorization of the affected person, images or audiovisual recordings that they have obtained with their consent in a home or any other place beyond the reach of third parties, when the disclosure undermines their privacy.
- Acquire, without being authorised, passwords, computer programs or access codes, to access the Group's computer system in order to acquire information or provide it to third parties.
- Failure to comply with the Group's confidentiality and data protection policies
- Forwarding intimate images or audiovisual recordings to third parties, without the consent of the affected person.

It will not be understood that an illegitimate interference has occurred when it has taken place by the Group in the exercise of its power of control and supervision as established in the internal procedures of the company, subject to the legal requirements in force.

What is expected of the Group's employees and related persons

That they not only comply with the provisions of the applicable regulations relating to the protection of personal data, but also, in compliance with them, respect the necessary security measures (physical and logical) in terms of data processing and storage, and in general the measures established by the Group in this regard. They are also expected not to make use of information that is not public, including that which they have obtained from a previous employer.

In this regard, they are required to comply with both the Group's Code of Conduct and, especially, with the corporate policy on "Functions and obligations of users in terms of personal data protection, computer security and internet access" in order to minimise any possible risk.

In the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.6. Crimes of discovery and disclosure of company secrets

Introduction and legal reference

The crimes of discovery and disclosure of company secrets are regulated in articles 278, 279, 280 and 288 of the Spanish Penal Code, and punish the use, dissemination, discovery, disclosure or transfer of company secrets: To seize by any means data, documents, whether written or electronic, computer supports or other objects that constitute confidential information of another company, entity, etc., for their use, dissemination, disclosure, or transfer.

The forwarding to third parties, without the consent of the affected person, of intimate images or audiovisual recordings is also classified as conduct associated with this Crime.

The commission of these crimes can only materialize intentionally.

For more information, you can consult the legal text that refers to the conducts discussed directly in the Spanish Criminal Code in force BOE.es - Agencia Estatal Official State Gazette

Prohibited conduct

- Using any type of information or documentation, physical or electronic, belonging to another company, to which access has been obtained, or which has been obtained as a result of a previous job or without the consent of the same.
- Use the network, computers or other resources of the Group or a third party to gain unauthorised access to any other computer equipment or system.
- Obtaining secrets from potential competitors through the hiring of personnel from other companies. Requiring an employee to disclose information about his former employer that can be considered confidential.

- Obtaining data, written documents, computer supports or other (secret) from potential competitors that may affect competition in order to use it for their own benefit.
- To seize, without consent or authorisation, files, databases or computer tools of a company with information relating to it (list of company customers, price at which the product is sold, quantity at which the product is sold, premises where the product is sold).
- Inducing an employee of a competing company, customer, supplier or distributor to supply and disclose a company secret (by payment of an amount, bonus, guarantee of completion of an operation or promise of future employment contract...).
- Disclose confidential information that qualifies as a business secret that has become known by participating in a contract negotiation process or by providing any type of advice.
- Forwarding intimate images or audiovisual recordings to third parties, without the consent of the affected person.

What is expected of the Group's employees and related persons

That avoid any type of practice that may involve the commission of crimes of seizure, dissemination or disclosure of company secrets, are obliged to respect company secrets; both those of the Group and those of other third parties with which it is related, taking into account their level of sensitivity and criticality, as well as respecting the security measures established by the Group to protect data, programs or computer systems. The mere intrusion into them in violation of these measures constitutes hacking and is strictly prohibited.

In the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.7. Scam and fraud crimes

Introduction and legal reference

Articles 248, 249, 250, 251 and 251 bis of the Spanish Penal Code include the Crimes of fraud, punishing the natural or legal person who, by himself or through an intermediary, with the intention of obtaining an economic benefit, and with a malicious attitude, deceives another person so that he or she performs an act of economic disposition to his or her own detriment or that of others.

In many cases, the legislator seeks to protect citizens from cases of investment scams or real estate scams, which will also be the most common in the case of legal entities.

It is understood that the so-called "misleading advertising" can also lead to the commission of the crime of fraud in accordance with the parameters of consumer and user protection. For this reason, in its relationship with third parties, as well as with its own employees, extreme transparency must be exercised in the information issued so that it does not include untruthful data that could lead the Group to obtain an economic benefit, both in terms of production and marketing of its products, always being clear in the information they issue about their products or services or other similar issues.

The crime of fraud differs from misappropriation because in the latter the subject receives an asset from the victim and does not return it, without deception or cunning. It differs from theft in that in the latter the perpetrator takes possession of the property without the consent of the owner or possessor of the property, while in fraud the property is received from the hands of the victim.

As for the aggravated types of crime, they will occur when the fraud: (a) Falls on basic necessities, housing or goods of recognised social utility; (b) It is presented by abusing the signature of another or by stealing, concealing or rendering useless a process, file or public or official document: (C) It falls on goods that make up the artistic, historical, cultural or scientific heritage: (d) It is particularly serious depending on the extent of the damage and the economic situation in which the victim and his or her family are left; (e) It exceeds 50,000 euros or affects a large number of people; (f) It is committed with abuse of the personal relationships between the victim and the fraudster or the fraudster takes advantage of his or her business or professional credibility; (g) Procedural fraud is committed, manipulating evidence and causing error in the Judge or Court and leading him to issue a sentence that harms the economic interests of the other party or a third party.

This crime can only be committed intentionally.

For more information, you can consult the legal text that refers to the conducts discussed directly in the Spanish Criminal Code in force BOE.es - Agencia Estatal Official State Gazette

Prohibited conduct

- To sign and/or allow to be entered into any type of contract, agreement or public offer with third parties or with the Public Administration, knowing that it is impossible to comply with the obligations assumed and for the benefit of the Group or a third party.
- Falsifying any data or documentation in order to obtain the signing of a contract or agreement, as well as obtaining any type of property, for the benefit of the Group or a third party.
- To deceive or lie about the conditions in the provision of a service or the execution of an activity.
- Failing to comply with the Group's procurement rules and procedures.
- Falsely attributing to a movable or immovable thing the power of disposal that one lacks, either because one has never had it, or because one has already exercised it, and alienating, encumbering or leasing to another, to the detriment of the latter or of a third party.
- Disposing of a movable or immovable thing concealing the existence of any charge on it, or having disposed of it as free, encumbering or alienating it again before the

definitive transfer to the purchaser, to the detriment of the latter, or of a third party.

- Granting a simulated contract to the detriment of another.

What is expected of the Group's employees and related persons

- Honest and transparent conduct and absolute respect for the legality and veracity and integrity of the information provided to the Related Persons or other Third Parties with whom it is related, whether they are customers, suppliers, or third parties in general, adapting at all times to the rules of good commercial faith.
- They are required to meet the Group's quality criteria in order to minimise any potential risk.
- Do not offer information or carry out actions that may be misleading or deceive Related Persons, in particular customers, or any Third Party to get them to carry out any operation or contract any service with the Group.
- Do not disseminate information that is not clear and transparent.
- Duly attend to complaints made by customers within the framework of the services provided.

In the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.8. Computer damage crimes

Introduction and legal reference

Articles 264, 264 bis, 264 ter and 264 quarter of the Criminal Code punish actions relating to computer damage in general and, specifically, to practices that damage, deteriorate, alter, delete or make inaccessible data, computer programs or electronic documents, files of others, all without authorization and when the result produced is serious; as well as preventing or hindering the operation of other people's computer systems.

Within a legal person, the conduct detailed in the previous section that allows the operation of a computer system of another (for example, of a competitor) to be seriously interrupted will be punished, as well as the production, acquisition, import or provision to third parties of computer programs, computer passwords or access codes, among others, to facilitate the commission of the crime.

Computer manipulation behaviors that cause this deception and the consequent transfer of assets (phishing) are punished, as well as the manufacture, introduction, possession or facilitation of a computer program for this purpose.

For more information, you can consult the legal text that refers to the conducts discussed directly in the Spanish Criminal Code in force BOE.es - Agencia Estatal Official State Gazette

Prohibited conduct

- Damage, deteriorate, alter, delete or make inaccessible computer data, computer programs or electronic documents of others, when the result produced is serious.
- Without being authorized and in a serious manner, obstructing or interrupting the operation of a computer system of another: (a) Carrying out any of the behaviors referred to in the previous point; (b) Entering or transmitting data; (c) Destroying, damaging, disabling, eliminating or replacing a computer, telematics or electronic information storage system.
- Without being duly authorized, produce, acquire for use, amount or in any way provide to third parties: o a computer program, designed or adapted primarily to commit any of the crimes described above; or a computer password, an access code or similar data that allows access to all or part of an information system.

What is expected of the Group's employees and related persons

In view of the damage that could be caused to third parties through the practices described, and especially those with suitable or sufficient skills and means to carry them out, all of them are expected to adapt their behaviour to the provisions of the corporate policy on "Functions and obligations of users in terms of personal data protection, computer security and internet access" in order to minimise any possible risk.

In the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.9. Intellectual Property Crimes

Introduction and legal reference

Articles 270, 271 and 272 of the Spanish Penal Code punish those persons who, for profit, carry out conduct that may infringe the intellectual property rights of others, harming their legitimate owners, assignees or licensees, and specifically: reproducing, plagiarizing, or publicly communicating, in whole or in part, a literary (book), artistic (painting or photograph) or scientific (specific theory, applications or computer programs) work, or its transformation, interpretation or artistic execution fixed in any type of support or communicated through any means, without the authorization of the owners.
For example, this Crime is applicable to those cases in which applications or computer programs are used without the corresponding license of use.
For more information, you can consult the legal text that refers to the conducts discussed directly in the Spanish Criminal Code in force BOE.es - Agencia Estatal Official State Gazette

Prohibited conduct

- Reproducing, copying or distributing literary, scientific or artistic works, without the authorisation of the owners of the rights of the works or their assignees, to the detriment of a third party and with the aim of obtaining an economic benefit.
- Transforming, interpreting or making public literary, scientific or artistic works, without the authorisation of the owners of the rights of the works or their assignees, to the detriment of a third party and in order to obtain an economic benefit.
- Exporting or storing copies of works, productions or executions without the aforementioned authorisation, when they are intended to be reproduced, distributed or publicly communicated.
- Eliminate or modify, without the authorization of the owners of intellectual property rights or their assignees, the effective technological measures incorporated by them in order to prevent or restrict their realization.
- Avoiding or facilitating the circumvention of effective technological measures to avoid the above conduct.
- Copying software (programs, operating systems, etc.), downloading or downloading files from the Internet without the corresponding authorization or license.

What is expected of the Group's employees and related persons

All of them, without prejudice to the permissions and computer filters they have, are expected to use the computer equipment provided by the Group (hardware and software) for the purposes provided for in the internal computer regulations, avoiding, in any case, the unauthorized downloading of computer programs or files (music, films, etc.) and promoting a legitimate use of the programs used for the exercise of their functions, through the application for the corresponding license.

In the same way, they should pay special attention to the unauthorized use of material (texts, images, etc.) that are not of their own creation (generated by personnel hired for this purpose), making sure that the appropriate rights for their use are available.

In the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.10. Crimes against industrial property

Introduction and legal reference

Articles 273, 274, 275, 276 and 277 of the Criminal Code punish aspects related to the infringement of rights relating to: (i) utility models and patents; (ii) trademarks, trade names and signs of establishments; and/or (iii) appellations of origin. It is punishable to reproduce, imitate, etc. a distinctive sign without the consent of the owner, so that another sign identical or confusing with it is obtained, to distinguish the same or similar products, services, activities or establishments.

Among the main typified conducts would be the manufacture, production or import of protected objects or goods, provided that it is carried out for industrial and/or commercial purposes and without the prior consent of the owner of the rights.

Likewise, the offer, distribution or marketing of products that incorporate a distinctive sign identical or confusing to the one that has its trademark right duly registered, as well as the storage of products that incur in these cases (for example, introducing counterfeit products into Spain; carrying out the reproduction and/or imitation of a utility model, patent, mold, etc., taking into account that simple possession and "internal" use already constitute an illegal act).

For more information, you can consult the legal text that refers to the conducts discussed directly in the Spanish Criminal Code in force BOE.es - Agencia Estatal Official State Gazette

Prohibited conduct

- Manufacturing, producing, importing, having, using, offering or introducing into the market a patent, trademark or utility model, without the consent of its owner and knowing that it is a registered work.
- Using or offering the use of a process that is the subject of a patent without the necessary authorization or consent.
- Reproducing, imitating, modifying, using or importing an identical or confusing distinctive sign to distinguish the same or similar products, services, activities or establishments, for industrial or commercial purposes and without the consent of the owner of the registered industrial property right.
- Possessing to market products or services with distinctive signs that infringe the rights of their owner (even if the products are imported).
- Marketing products or services with distinctive signs that infringe the rights of their owner (even if the products are imported).
- Register as its own any type of industrial or intellectual property obtained in the performance of the functions entrusted to it in the Group or using its material, economic and/or personal resources.

What is expected of the Group's employees and related persons

All of them are expected to use their products and/or services of the Group in accordance with current regulations on Trademarks and Patents, avoiding in any case cases of imitations or any other practices that may generate confusion in the market with other people's industrial property rights, respecting the rights of their competitors and other third parties in these matters, thus promoting legitimate competition in accordance with the law.

In the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.11. Misleading advertising crimes

Introduction and legal reference

The crimes of misleading advertising, referred to in articles 282 and 288 of the Spanish Penal Code, punish making offers or advertising of products or services, where false allegations are made or uncertain characteristics are manifested about them, so that they can cause serious and manifest damage to consumers.
The crimes of misleading advertising are based both on Article 51 of the Spanish Constitution and on the right of consumers to receive truthful information about the goods or services they purchase.

On the other hand, illegal advertising, which is an administrative offence, in accordance with Law 34/1988, of 11 November, General Advertising, is punished here in its most serious manifestation, which is misleading advertising that seriously harms consumers

Unlike the Crimes of fraud (requires that the behavior be directed against an identifiable individual property), in the Crimes of misleading advertising it is an unavoidable condition the affectation of a legal asset of a collective or supra-individual nature, whose owner, the passive subject of the Crimes, is of a collective nature, that is, the consumers.

In this sense, the assessment of the typical conduct of the Crimes of misleading advertising requires the concurrence of two central elements: a) The advertising or offer of products or services b) The falsehood of such advertising or offer through false allegations or manifestation of uncertain characteristics about such products or services, in a way that is apt to cause serious economic damage to consumers.

For this reason, those cases that are not worthy of criminal reproach due to their minor nature will not be understood to be included within the Crimes of misleading advertising. The advertising must, therefore, be objectively false, manifesting a typical dangerousness to cause economic damage, which may materialize through any type of communication that allows products to be offered or advertised on the market aimed at a generality of people (media, written press, writings, graphic communications, sounds, etc.).

This Crime can only be committed intentionally

For more information, you can consult the legal text that refers to the conducts discussed directly in the Spanish Criminal Code in force [BOE.es - Agencia Estatal Official State Gazette]

Prohibited conduct

- Including in advertising uncertain characteristics of products or services, which are essential for the configuration of the same, and which, lacking it, could cause harm to the customers who contract it.
- Attributing properties to a certain product that it lacks, in order to attract customers.
- To provide customers, before and/or after contracting, with information about the products and services offered that is not truthful, exact, complete and precise or that may confuse them.
- Communicating to customers, through sales personnel, product or service properties that are not validated or that are false or uncertain.
- Marketing or advertising on the market products, activities or services that do not meet the characteristics with which they are offered or, on the contrary, omitting fundamental data from them when this may mislead the recipients.
- Designing labels or incorporating them into the company's products without having obtained their validation by the regulatory body or authority when this is mandatory.
- The labelling of the products does not coincide with their essential characteristics, and the labels contain false or simply inaccurate data.
- Altering or manipulating, in the production phase of a product, its composition in relation to what is stated in the labelling or advertising campaigns.

What is expected of the Group's employees and related persons

That they avoid any type of practice that may involve the commission of Crimes of misleading advertising, and must ensure the veracity of the information they give to current or potential customers and to Related Persons and Third Parties, on the characteristics and conditions of the products and services offered; they will also duly inform customers about the offers of products and services and their risks, and will avoid any conduct in advertising, marketing and sales that may involve deception or lack of information.

In the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.12. Money laundering offences

Introduction and legal reference

Articles 298, 300, 301, 302 and 304 of the Spanish Penal Code jointly regulate the offences of receipt and money laundering. Their association is motivated by the fact that both offences protect property and punish conduct aimed at giving legal tender to goods (reception) or money (money laundering) from illegal activities.
Thus, those who, with the aim of profit and with knowledge of the commission of a Crimes against property, without being the author or accomplice in it, give legal tender to goods of illegal origin with the purpose of obtaining a profit, incur in a Crimes of reception.

Similarly, money laundering crimes are classified as the possession or trafficking of money of illegal origin.

Accepting funds, deposits, etc. that have their origin in the commission of a Crime, or performing any other act to conceal such illicit origin, or to assist the person who has participated in the offense, is punishable.

It can be committed recklessly if it is acted without due diligence, that is, it is not necessary for the perpetrator to want and know that the crime is going to be committed.

Any legal person can be subject to a Money Laundering Offence as established by criminal regulations, without the need to be a subject obliged to the special regulations that exist on this matter.

Thus, the acceptance of large amounts of cash increases the risks that this money may have an illicit origin (such as drug trafficking or the sale of stolen goods, etc.).

With regard to the offence of receipt, it will be necessary to pay special attention to the possible offer by a third party of goods in suspicious circumstances (for example, at a price significantly below the market price, lacking documentation or without the appropriate technical or original certificates when the goods require it, etc.).

For more information, you can consult the legal text that refers to the conducts discussed directly in the Spanish Criminal Code in force [BOE.es - Agencia Estatal Official State Gazette]

Prohibited conduct

- Failing to comply with obligations to prevent money laundering and terrorist financing.
- Carrying out operations in which the customer or supplier is not identified.
- Engage in operations or transactions intended to acquire, possess, convert, or transmit property derived from the commission of a Crime or to conceal or conceal such origin.
- Engaging in operations or transactions intended to conceal or conceal the true nature, origin, location, destination, movement or rights to or ownership of property derived from a crime.
- Accepting payments from members of the Company that do not conform to internally established payment procedures.

- Using, validating, or accounting for false documentary supports for the purpose of concealing expenses or acquisitions.
- Accept payments or transfers where there is no record of the origin of the funds.
- Splitting operations or the supporting documentation thereof, such as invoices, delivery notes, purchase orders or similar, in order to facilitate the collection of amounts in cash.
- Failure to comply with the provisions of the Group's Money Laundering Prevention Manual.

What is expected of the Group's employees and related persons

They are expected to act with the diligence required by the Group, remaining alert to suspicious transactions (unknown suppliers, material offered that lacks documentary support, technical or origin certificates, price significantly lower than the market price, collection or payment in cash, origin or destination of the payment from tax havens, etc.), proceeding to communicate it as soon as possible to their superiors and to the Internal Control Body for the Prevention of Money Laundering by email (comunicacionoci@grma.masaveu.com) or written communication to the following postal address C/ Cimadevilla, 8 33003 Oviedo (Asturias). Whoever reports the suspicious transaction will do so without disclosing to the third party involved the control and investigation actions that are being carried out.

Likewise, those who, in the exercise of their positions and functions, enter into commercial relations for the Group, review the integrity and honesty of the natural and legal persons with whom they intend to initiate such commercial relations, as well as with those who have already entered into them, in order to avoid the possible commission of the Crimes in this way, and communicate any concerns in this regard to the Internal Control Body by the means indicated above.

In this regard, they are required to comply with the Group's internal regulations on the prevention of money laundering in order to minimise any possible risks.

5.13. Terrorist financing offences

Introduction and Reference

The entry into force of Law 2/2015, of 30 March, entailed the modification of the chapter of the Criminal Code in which terrorist offences are provided, expanding the conduct for which legal persons can be criminally liable in relation to possible participation in terrorist groups or activities.

Thus, article 576 of the Penal Code classifies as Crimes the direct or indirect financing of terrorism either through the acquisition, possession, use, transmission or by any other activity with goods or securities of any kind, and by any means, with the intention that such funds or assets are, or knowing that they will be used -totally or partially-, to commit crimes related to terrorist organizations and groups, both in Spanish territory and outside it, or to make them reach them.
It can be committed recklessly, that is, it is not necessary for the perpetrator to want and know that the crime is going to be committed.

In this regard, it is vitally important to know the activities that are being financed or subsidized with the Group's money, and it is necessary to verify what is the ultimate destination of the sponsorship or financial aid and what its real purpose is (for example, requesting certificates from the entity that receives it on the use of the amounts donated or on the registered corporate purpose, etc.) in order to avoid the possible financing of entities linked to terrorist groups.

For more information, you can consult the legal text that refers to the conducts discussed directly in the Spanish Criminal Code in force BOE.es - Agencia Estatal Official State Gazette

Prohibited conduct

- Acquiring goods or contracting services with an individual or company with respect to which there are well-founded suspicions that it may be carrying out activities aimed at providing or collecting funds to finance the criminal activities of a terrorist group.
- Failing to comply with the obligations regarding the prevention of money laundering and financing.
- Failure to comply with the provisions of the Group's Money Laundering Prevention Manual.

What is expected of the Group's employees and related persons

All of them are expected to remain vigilant against suspicious transactions in the terms set out in the Offences of Money Laundering and Reception, and also to show special diligence when designating which organisations will receive subsidies or sponsorships, avoiding, in any case, that the Group's funds or assets end up supporting terrorist activities or being made available to terrorist groups.

In the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.14. Insider Trading Offenses

Introduction and legal reference

Articles 285, 285 ter and 285 quarter and 288 of the Spanish Penal Code refer to the Crimes of abuse of privileged information on securities or financial instruments. The following conducts are penalized:

- Acquisition, transfer, assignment, or recommendation to a third party for its use, of a financial instrument, or cancellation or modification of an order relating to a financial instrument, using inside information provided that any of the following circumstances occur: a) obtaining profit or causing damage in excess of €500,000 b) value of the financial instruments used in excess of €2,000,000 c) causing serious impact on the integrity of the market.
- Possession of privileged information and its disclosure outside the normal exercise of their work, profession or functions, endangering the integrity of the market or the confidence of investors.

LO 1/2019, dated 20-2, amending the Criminal Code, amends article 285 of the Criminal Code, specifying who is understood to have reserved access to privileged information, and incorporating an aggravated case when the person responsible for the act is an employee or employee of an investment services firm, credit institution, supervisory or regulatory authority, or entities governing regulated markets or trading venues.

In relation to inside information, Article 7 of Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse establishes a concept of inside information that can be summarised as follows: "for the purposes of this Regulation, inside information shall be understood as any of the following types of information: (a) information of a specific nature which has not been made public, which relates directly or indirectly to one or more issuers or to one or more financial instruments or their derivatives and which, if made public, could have an appreciable influence on the prices of those instruments or derivative instruments related thereto (...)".

This information refers first of all to financial instruments and, in accordance with the reform carried out by LO 1/2019, also to contracts, conduct, operations and orders provided for in European and Spanish regulations on markets and financial instruments.

Two aggravated types are established:

- That the subject habitually engages in the above insider trading practices.
- That the benefit obtained, the loss avoided or the damage caused is of notorious importance.

For more information, you can consult the legal text that refers to the conducts discussed directly in the Spanish Criminal Code in force BOE.es - Agencia Estatal Official State Gazette

Prohibited conduct

- Using privileged information to which they have access due to the position they hold in the entity for purposes other than those of the position itself.
- Sell a shareholding package that is held in the portfolio because knowledge of the existence of a contingency in the company (unknown to the market) is acquired.
- Buying shares because you have access to relevant information about a company's expansion plans with a possible impact on the stock market.

What is expected of the Group's employees and related persons

That they avoid any type of practice that may involve the commission of Crimes of Insider Information on securities or financial instruments, and must not use non-public information about the Group or any other company to influence their decisions when trading securities.

Inside information must not be shared with others, including family members, relatives or other persons or institutions of the Group.
In the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.15. Crimes of forgery in means of payment (credit cards, debit cards or traveller's cheques)

Introduction and legal reference

Article 399 bis of the Penal Code criminalizes all practices that include the alteration, copying, reproduction or forgery of credit cards, debit cards or traveller's cheques.

Notwithstanding the fact that, due to their business activity, not all organisations have the necessary machinery to be able to manufacture and/or physically alter the means of payment indicated, it is possible to incur in this Offence through the possession of counterfeit credit cards, debit cards or traveller's cheques in order to distribute them or their use knowingly and to the detriment of others.

For more information, you can consult the legal text that refers to the conducts discussed directly in the Spanish Criminal Code in force BOE.es - Agencia Estatal Official State Gazette

Prohibited conduct

- Alter, copy, reproduce, or otherwise forge credit or debit cards or traveler's checks.
- Possession of counterfeit credit or debit cards or traveler's checks intended for distribution or trafficking.
- Using forged credit or debit cards or traveller's cheques, by someone who has not engaged in such forgery conduct, harming another and knowingly of the forgery.

What is expected of the Group's employees and related persons

That they take extreme precautions to prevent means of payment from being reproduced, altered or falsified, and must remain alert to the possible fraudulent use of numbers or codes referring to such documents, assessing whether it is really necessary to request, use and maintain this information and, in such a case, applying the corresponding physical and logical security measures and adequately safeguarding the technical means that could allow the type to be incurred.

In this regard, and in order to minimise any possible risk, in the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.16. Frustrated execution offences

Introduction and legal reference

Articles 257, 258, 258 bis and 258 ter of the Criminal Code punish conduct tending to hinder, delay or impede the effectiveness of an attachment or of an administrative or judicial proceeding - initiated or foreseeable to be initiated - through the disposition of assets or through acts generating obligations for the debtor over them to the detriment of the creditor.

The offences of frustration of execution include, together with the removal of assets, the concealment of assets in a judicial or administrative enforcement proceeding; as well as the unauthorized use by the depositary of assets seized by the Authority.

For more information, you can consult the legal text that refers to the conducts discussed directly in the Spanish Criminal Code in force BOE.es - Agencia Estatal Official State Gazette

Prohibited conduct

- Selling, imposing charges, concealing, disposing of or donating assets of any kind, movable (vehicles, shares, etc.) or real estate (premises, buildings, etc.) belonging to the Group, even temporarily, without having obtained the corresponding authorisations.
- Delaying, impeding or hindering the effectiveness of an attachment or an enforcement or judicial, extrajudicial or administrative enforcement procedure (initiated or foreseeable to begin) on an asset (movable or immovable) of the Group.
- Falsifying or altering the accounts, books, or any other instrument or similar document for the purpose of fraudulently obtaining the declaration of bankruptcy.
- Knowingly and in bad faith presenting incomplete information about the Group's assets or assets before a judicial or administrative enforcement proceeding that delays or hinders the satisfaction of the creditor.
- Making use of assets seized by a public authority that have been constituted as a deposit without being authorized to do so.

What is expected of the Group's employees and related persons

That they act honestly in the management of their obligations to third parties and submit their decisions to the principle of good faith.

Similarly, they must also ensure that the Related Persons of the Group with whom they regularly interact (especially with respect to the requests made by them) do not use the Group to carry out any type of act that delays, hinders or impedes, for example, the effectiveness of an attachment and, in general, that a third party may see their legitimate right to recover or collect their claims frustrated.

In this regard, it is required that they remain alert to requests from third parties that go beyond ordinary operations, such as payments to accounts that are owned by non-approved third parties, are not owned by the Related Person, changes in the recipient of invoices issued, etc., in order to minimise any possible risk.

In this regard, and in order to minimise any possible risk, in the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.17. Punishable insolvency offences

Introduction and legal reference

Article 259 of the Criminal Code regulates punishable insolvencies, punishing certain fraudulent conduct when there is a situation of current or imminent insolvency and that seeks to harm the mass of creditors, to give an idea of economic solvency, or to favor some creditors to the detriment of others.
Therefore, a set of actions contrary to the duty of diligence in the management of economic affairs are prohibited, through which the assets that are a guarantee of the fulfillment of obligations are unduly reduced, or the creditor is hindered or impossible to know the true economic situation of the debtor.

Prohibited conduct

- Disposing of the Group's assets, contracting or generating obligations against the interests of the Group and in favour of a creditor, in a situation of economic difficulty for the same.
- Favouring a creditor in bad faith to the detriment of another (whether public or private) derived from previous relations with the latter.
- Reach any type of agreement with a debtor to pay us in preference or to the detriment of another preferential creditor.
- In the event of an imminent situation of insolvency, concealing or damaging the Group's assets to prevent them from being included in the bankruptcy estate or carrying out acts of disposition by delivery or transfer of money without economic justification for doing so.
- Falsifying or altering the accounts, books, or any other similar instrument or document in order to hinder the assessment of the debtor's economic situation.

What is expected of the Group's employees and related persons

All of them are expected to exercise due diligence in the handling of financial aspects, and the regulations applicable to these matters (mainly accounting, tax and commercial), as well as absolute respect for legality -in general-, and veracity in financial information -in particular-, avoiding contributing to any situation that may lead to a decrease in the collection capacities or guarantees of Third Parties.

In this regard, all of them are required to remain especially alert to Related Persons who, in a situation of current or imminent insolvency, could make use of their commercial relationship with the Group to deceive third parties in good faith with whom they relate by offering these third parties financial information that does not reflect their financial reality.

In this regard, and in order to minimise any possible risk, in the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.18. Crimes against public health

Introduction and legal reference

Articles 359 et seq. of the Penal Code punish the manufacture, marketing or placing on the market of medicines that do not comply with current regulations or are deteriorated or expired, as well as the offer and distribution of false or altered medicines, as well as the preparation or production of a medical device for public consumption in a deceptive manner, supplying or marketing harmful substances or products that may wreak havoc on health.

In relation to food products, it is also punishable to offer on the market those that are not suitable for consumption, are expired, or do not include their composition or that it is altered. It is penalized not only to manufacture them but also to
marketing them when they are harmful to health, and the adulteration or poisoning of food, substances or beverages with unauthorised, infectious or seriously harmful substances. In terms of both medicines and food, it is important to comply with the provisions of the regulations regarding their production, storage, labelling, transport and marketing.

For more information, you can consult the legal text that refers to the conducts discussed directly in the Spanish Criminal Code in force BOE.es - Agencia Estatal Official State Gazette

Prohibited conduct

- To produce substances harmful to health or chemical products that can cause havoc without being duly authorized.
- Selling, supplying or trading with substances harmful to health or chemical products that can cause havoc without being duly authorized.
- Dispatching or supplying substances harmful to health or chemical products that can cause havoc in breach of the formalities provided for in the applicable regulations.
- Dispensing deteriorated or expired medicines or medicines that do not comply with the technical requirements relating to their composition, stability and efficacy, or replace them with others that endanger people's lives.
- Altering a medicine by giving it the appearance of a true drug, altering the amount or doses.

What is expected of the Group's employees and related persons

That they avoid any type of practice that could put people's health at risk, taking extreme care in the means of storage and transport used, as well as in the use of platforms suitable for e-commerce.

In this regard, and in order to minimise any possible risk, in the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.19. Crimes against natural resources and the environment

Introduction and legal reference

Depending on the seriousness of the act, those organisations which, in contravention of environmental protection regulations, directly or indirectly cause or carry out emissions, discharges, radiation, extraction or excavation, burial, noise, vibrations, injections or deposits, in the atmosphere, soil, subsoil or terrestrial, underground or maritime waters, including the high seas, with an impact even on transboundary areas, as well as water catchments that may seriously damage the balance of natural systems, will be punished.

It also penalises the collection, transport, recovery, disposal and use of waste that seriously endangers the lives of people, or damage to the air, soil, water, or animals and plants, as well as the absence of adequate control or surveillance that causes or may cause substantial damage to them.

Possible disobedience of the express orders of the administrative authority for the correction or suspension of the typified activities, the falsification or concealment of information on the environmental aspects of the company or the obstruction of the inspection activity of the Administration in these matters is also contemplated.
The penalties associated with the aforementioned criminal conduct shall be aggravated in the event that any of the following circumstances are observed:

- The industry or activity operates clandestinely, without having obtained the mandatory authorisation or administrative approval of its facilities.
- The express orders of the administrative authority to correct or suspend the activities have been disobeyed.
- Information on environmental aspects has been falsified or concealed.
- The inspection activity of the Administration has been obstructed.
- Irreversible or catastrophic damage has occurred.
- Illegal extraction of water is carried out in times of restrictions

To this end, it should be noted that the materialization of the present crimes could derive from their commission due to recklessness.

For more information, you can consult the legal text that refers to the conducts discussed directly in the Spanish Criminal Code in force BOE.es - Agencia Estatal Official State Gazette

Prohibited conduct

- Causing or carrying out, directly or indirectly, and without being duly authorised, emissions, discharges, radiation, extractions or excavations, in the atmosphere, soil, subsoil, terrestrial, groundwater or maritime, including the high seas and transboundary areas, causing damage to the balance of natural systems or to people.
- Causing or carrying out, directly or indirectly and without being duly authorised, landing, noise, vibrations, injections or deposits in the atmosphere, soil, subsoil, terrestrial, underground or maritime waters, including the high seas and transboundary spaces, causing damage to the balance of natural systems or to people.

- Carrying out clandestine activities or without having obtained the corresponding authorisation or licence for the start and exercise of the activity.
- Falsifying or concealing environmental information.
- Collecting, transporting, recovering, eliminating or taking advantage of waste that seriously endangers people, animals or plants, air, soil or water quality.
- Omitting in any way the duties of vigilance of internal procedures in the field of prevention and environmental safety.
- Obstructing any type of inspection activity.
- Failing to comply with the Group's quality and environmental regulations.

What is expected of the Group's employees and related persons

That they promote and carry out collaborative conduct with the Administration in environmental matters, providing it with the requested information on these issues and facilitating its inspection or verification activity. Likewise, those persons who, due to their position or function in the Administration so requires, are expected to have and keep updated the necessary knowledge of environmental regulations, ensuring that the existence of the appropriate certifications and the adequacy of the Group's actions to the corresponding technical requirements are ascertained.

In this sense, they are required to comply with the values expressed in the Code of Conduct, and the corporate policies that develop it on respect for the environment in order to minimize any possible risk.

In this regard, and in order to minimise any possible risk, in the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.20. Crimes committed against territorial planning and urban planning

Introduction and legal reference

Articles 319 and 320 of the Spanish Penal Code punish conduct that violates urban planning regulations, including the possible carrying out of unauthorised works on land or property in the public domain, or that have a landscape, ecological, artistic, historical or cultural value, or that have been considered to be of special protection. Specifically: carrying out by developers, builders or technical directors of unauthorised urbanisation, construction or building works on land intended for roads, green areas, public domain property or places that have been legally or administratively recognised as having their scenic, ecological, artistic, historical or cultural value, or for the same reasons have been considered to be of special protection, or on non-developable land.

However, and without prejudice to the fact that the ordinary activities carried out by some divisions of the Group are not included in the category of developer, construction company or technical director, the Group could be criminally sanctioned if this conduct coincides with others linked to crimes against natural resources and the environment, since carrying out openings of premises or works of special importance without having the appropriate and specific administrative license would entail a aggravating circumstance.

For more information, you can consult the legal text that refers to the conducts discussed directly in the Spanish Criminal Code in force [BOE.es - Agencia Estatal Official State Gazette]

Prohibited conduct

- Seriously altering, by any means, those buildings that house Group facilities and that are considered to be of historical, artistic, cultural or monumental interest.
- Causing the demolition, by any means, of those buildings that house Group facilities and that are considered to be of historical, artistic, cultural or monumental interest

What is expected of the Group's employees and related persons

All of them are expected to comply with the provisions of the Penal Code, in order to comply scrupulously with the procedure for applying, processing and obtaining administrative licences for the opening of premises, carrying out works or any other purpose whose non-compliance may result in the commission of a crime against territorial planning and urban planning, refraining from carrying out works of any entity without having obtained the corresponding advice and approval from the Group.

In this regard, it is necessary to stress the control of the correct chronological order in terms of the granting of licences and subsequent opening of any establishment that requires such administrative licences, as well as the maintenance of their conditions.
In this regard, and in order to minimise any possible risk, in the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.21. Offences against the rights of foreign citizens

Introduction and legal reference

Article 318 bis of the Criminal Code punishes the acts of those who, intentionally, promote or facilitate the illegal trafficking, transit or clandestine immigration of non-nationals of an EU Member State in Spanish territory, in violation of the legislation on the entry or transit of foreigners.
This offence can be related to offences against the Public Treasury and Social Security and trafficking in human beings, given that the promotion or facilitation of illegal trafficking or clandestine immigration of persons usually entails the irregular recruitment of persons in order to exploit them.

As a result of the growth of illegal immigration to Spain and other countries of the European Union, the transfer of immigrants has become an economically profitable business in the hands of mafias and criminal organisations that obtain large sums of money at the expense of the situation of need, desperation and vulnerability of immigrants. The legislator, through article 318 bis CP and Organic Law 4/2000, of 11 January, on Foreigners, has tried to put a stop to these practices.

The aforementioned article of the Penal Code criminalizes any conduct aimed at intentionally enticing a person who is not a member of a State in the European Union to enter Spanish territory, move or remain in Spain contrary to current legislation. Among the behaviors that are considered criminal are intentionally helping to enter Spain; intentionally helping to transit through Spanish territory; and intentionally helping for profit to remain in Spain.

Cases of aggravation of the penalty for the existence of profit motive (only the agreement of a payment is sufficient); membership of a criminal organization; when the person who carries out the crime is the leader, administrator or person in charge of these criminal organizations; when there is a danger to the life or physical integrity of the immigrant or when the criminal act is carried out with the prevalence of the status of authority, agent of the same or public official.

Exemption from punishment is possible in cases where the objective pursued by the offender is solely to provide humanitarian aid to the person concerned, understood as emergency aid provided in disaster situations
natural or human (such as armed conflicts).

For more information, you can consult the legal text that refers to the conducts discussed directly in the Spanish Criminal Code in force BOE.es - Agencia Estatal Official State Gazette

Prohibited conduct

- Facilitate entry into Spain by vehicle through border crossings with the immigrant hidden in a double bottom or ad hoc space for concealment
- To receive illegal immigrants, give them asylum and facilitate their incorporation into the world of work, without a work permit.
- To provide foreign citizens who are in Spain with the necessary conditions to remain and settle illegally in Spanish territory.
- Facilitate entry into Spain with a simulation of an employment relationship, through a job offer without there being any intention for the recipient to join it.
- Transferring to Spain foreign workers deceived by the appearance of employment contracts that do not obey a real situation.
- Introducing foreigners into Spanish territory without complying with the regulations on migration.
- Carry out procedures from Spain to recruit and bring foreign citizens without the corresponding permits.

What is expected of the Group's employees and related persons

That they are especially careful and responsible in the selection of the Related Persons with whom the Group is directly or indirectly linked. In the same way, those services that are provided by third parties on a recurring basis for the Group must be emphasized. They are expected to remain alert with respect to the working conditions of the people under their supervision, taking special care to comply with the Code of Conduct and corporate policies in relation to respect for human rights and workers' rights.

In this regard, and in order to minimise any possible risk, in the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.22. Crimes of illegal financing of political parties

Introduction and legal reference

Articles 304 bis and 304 ter of the Penal Code punish, among other conducts, donations or contributions intended for a political party, federation, coalition or group of voters, in the terms provided for in the specific regulations on the financing of political parties and including, for the purposes of this Policy, donations made to foundations linked to political parties; in short: delivering donations or contributions intended for a political party, federation, coalition or group of voters illegally.

Thus, it is intended to avoid situations in which economic interests may have an impact on the structure of parties and their possible political participation (for example, through the delivery of money to political parties by a company or through the transfer of any of its facilities free of charge or for an amount lower than the market price for the holding of electoral campaigns or other political events, etc.).

For more information, you can consult the legal text that refers to the conducts discussed directly in the Spanish Criminal Code in force BOE.es - Agencia Estatal Official State Gazette

Prohibited conduct

- To receive, or deliver by himself or through an intermediary, donations or contributions destined to a political party, federation, coalition or group of voters, outside the provisions of the law.

What is expected of the Group's employees and related persons

That they avoid any type of delivery of goods and services (direct or indirect), including but not limited to those of an economic nature, under free or advantageous conditions with direct or indirect destination to political parties, showing special diligence when making donations or contributions, complying with current legislation in this area and with the Group's guidelines on the treatment of gifts and benefits from/for external third parties and donations, sponsorships and management commitments, in order to minimise any possible conduct that could be understood as a donation to political parties, nor sponsor causes linked to them or their political campaigns.

In this regard, and in order to minimise any possible risk, in the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.23. Crimes of market manipulation of raw materials or basic necessities

Introduction and legal reference

Articles 281 and 288 of the Spanish Penal Code refer to the crime of withdrawing raw materials or basic necessities from the market with the intention of desupplying a sector of the market, of forcing an alteration of prices, or of seriously harming consumers.

To withdraw is understood to be: to subtract, subtract or remove through the storage or stockpiling of these goods.

Basic necessities are those that serve consumption in an essential way for subsistence or health, such as bread or medicines.

The means of commission may consist of hoarding, seizure, mass purchases, reducing production, etc.

The withdrawal must take place for one of the following purposes:

- To desupply the market or a sector of it.
- Force an alteration in prices.
- To seriously harm consumers, the damage must be economic.

It is a tendential crime, that is, the action must be aimed at those purposes, even if they do not occur. The consummation will occur by the simple fact of the withdrawal with the purpose advocated without it being necessary that there has actually been a shortage, the alteration of prices or serious damage to consumers. The interest of consumers is protected, in which the supply of raw materials or basic necessities is carried out with normal development and respecting the corresponding rules. The taxable person is the competitors and the consumers, as a group.

An aggravated subtype is contemplated if the act is carried out in situations of serious need or catastrophic.

For more information, you can consult the legal text that refers to the conducts discussed directly in the Spanish Criminal Code in force BOE.es - Agencia Estatal Official State Gazette

Prohibited conduct

- Agreeing with competitors not to supply consumers for a certain period of time in order to obtain an increase in the prices of the raw material or basic necessities object of activity.

What is expected of the Group's employees and related persons

That they avoid any type of abusive practice in the market that harms the interest of consumers.

In this regard, and in order to minimise any possible risk, in the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.24. False Billing Crimes

Introduction and legal reference

Articles 283 and 288 of the Spanish Penal Code refer to this crime that punishes conduct related to invoicing higher amounts for products or services whose cost or price is measured by automatic devices, through the alteration or manipulation of these, to the detriment of the consumer.

Two requirements for the commission of the crime must be met:

- That the invoicing takes place in products or services whose price is determined by automatic devices (pumps, telephone pacemakers, etc...).
- That the undue billing occurs as a result of the manipulation of the machine. Cases such as billing made by a person, false readings of devices that work correctly will be excluded from the application of the type.

It is a crime of danger to the economic interests of consumers, since its consummation does not require that there be actual damage. The taxable person is the consumers as a group.

For more information, you can consult the legal text that refers to the conducts discussed directly in the Spanish Criminal Code in force BOE.es - Agencia Estatal Official State Gazette

Prohibited conduct

- Alter automatic billing systems in order to provide a higher cost than the real one (weighing scales, bottling machines, etc.).

What is expected of the Group's employees and related persons

That they avoid any type of practice that may involve the commission of the crime of fraudulent invoicing of higher amounts whose cost or price is measured by automatic devices.

In this regard, and in order to minimise any possible risk, in the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.25. Counterfeit currency offences

Introduction and legal reference

Articles 386, 387 and 388 of the Penal Code punish the alteration or manufacture of counterfeit currency, the introduction into the country or export of counterfeit currency, the transport, issuance or distribution of counterfeit or altered currency with knowledge of its counterfeitness, including its putting into circulation; as well as possessing, receiving, obtaining counterfeit currency for its issuance or distribution or putting into circulation, selling or distributing counterfeit currency after having received it in good faith after being aware of its counterfeitness.

These offences will be prosecuted regardless of whether they have been committed in Spanish territory or outside it, and the judge or court may impose fines on the legal person that could reach an amount of up to ten times the apparent value of the currency as well as other accessory penalties provided for in the Criminal Code (temporary closure of premises, suspension of activities, temporary disqualification from obtaining subsidies and public aid and from enjoying tax incentives, among others).
It should be noted that not only the manufacture of counterfeit currency is penalized, but also the conscious putting into circulation of the currency to which one has had access (because payments have been received with it, for example).

For more information, you can consult the legal text that refers to the conducts discussed directly in the Spanish Criminal Code in force BOE.es - Agencia Estatal Official State Gazette

Prohibited conduct

- Changing counterfeit currency in the bank knowing that it is counterfeit.
- Introducing counterfeit currency into Spain with knowledge of its counterfeitness.
- To have counterfeit currency intended for sale.

What is expected of the Group's employees and related persons

That they exercise extreme diligence to avoid any type of practice that may involve the distribution of currency after knowing its counterfeitness, as well as any other that could be related to the commission of crimes related to the counterfeiting of currency and stamped bills with instruments of the Group, ensuring security in economic traffic and monetary security.

In this regard, and in order to minimise any possible risk, in the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.26. Smuggling crimes

Introduction and legal reference

Although this offence is not expressly included in the Penal Code, in 2011 Organic Law 12/1995, of 12 December, on the repression of smuggling, was amended, including the possible requirement of criminal liability of legal persons (article 6) for the commission of certain actions related to imports and exports when they exceed a certain economic amount and violate customs legislation, provided that the circumstances provided for in article 31 bis of the Penal Code are met; for example, importing or exporting goods of licit trade in an irregular manner, provided that the value of the goods, merchandise, goods or effects is equal to or greater than 150,000 euros.

Similarly, it is provided that those who commit any of the acts described in paragraphs 1 and 2 of the aforementioned Law will commit smuggling offences, if any of the following circumstances occur:

- The object of smuggling is toxic drugs, narcotics, psychotropic substances, weapons, explosives, biological agents or toxins, toxic chemicals, or any other property the possession of which constitutes a crime, or when the smuggling is carried out through an organization, regardless of the value of the goods, merchandise or goods.
- The object of the contraband includes tobacco products whose value is equal to or greater than 15,000 euros.
- In execution of a preconceived plan or taking advantage of the same occasion, the author carries out a number of actions or omissions provided for in paragraphs 1 and 2 of the aforementioned Law in which the value of the goods, merchandise, goods or effects considered in isolation does not reach the quantitative limits of 150,000, 50,000 or 15,000 euros established in the previous paragraphs of this article, but their accumulated value is equal to or greater than these amounts.
  Thus, companies may be liable for smuggling goods with a value equal to or greater than a certain amount (150,000 euros or 50,000 euros) or for smuggling goods whose mere possession already constitutes a crime regardless of their value.

Among the conducts that, accompanied by an amount greater than 150,000 euros, will be considered a crime are:

- Importing or exporting goods of lawful trade without presenting them for clearance at customs offices or at places authorized by the Customs Administration. The conduct is extended with the consideration that the concealment or removal of any kind of goods from the action of the Customs Administration within the authorized premises or places will be equivalent to non-presentation.
- Carrying out trade, possession or circulation of non-EU goods of lawful trade without complying with the legally established requirements to prove their lawful importation.
- To use goods in transit in breach of the regulations governing this customs procedure.

- Importing or exporting goods subject to trade policy measures without complying with the applicable provisions in force; or when the operation is subject to prior administrative authorisation and this is obtained either by application with false data or documents in relation to the nature or ultimate destination of such products, or in any other unlawful way.
- Obtaining, or attempting to obtain, by means of a false or in any other unlawful way, the release of the goods in accordance with the provisions of Article 123 of Regulation (EC) No 450/2008 of the European Parliament and of the Council of 23 April 2008.
- Driving non-EU goods on a vessel smaller than that permitted by the regulations, unless authorised to do so, in any port or place on the coasts not authorised for customs purposes, or at any point in the internal waters or the Spanish Territorial Sea or contiguous area.
- Smuggling or clandestinely transshipping from a ship any kind of goods, goods or effects within the internal waters or the Spanish territorial sea or contiguous zone, or in the circumstances provided for in Article 111 of the United Nations Convention on the Law of the Sea, signed in Montego Bay, Jamaica, on December 10, 1982.

Reducing the amount to 50,000 euros, the following conducts will be considered a crime:

- Exporting or dispatching goods that make up the Spanish Historical Heritage without the authorisation of the competent Administration when this is necessary, or having obtained it either by means of its request with false data or documents in relation to the nature or ultimate destination of such products or in any other illicit way.
- Carrying out import, export, trade, possession, circulation of: stagnant or prohibited goods, including their production or rehabilitation, without complying with the requirements established by law; or specimens of wild fauna and flora and their parts and products, of species included in the Washington Convention of 3 March 1973 or in Council Regulation (EC) No 338/1997 of 9 December 1996, without complying with the legally established requirements.
- Importing, exporting, introducing, dispatching or carrying out any other operation subject to the control provided for in the corresponding regulations referring to the goods subject to it by any of the following provisions:
  - The regulations governing foreign trade in defence material, other material or dual-use goods and technologies without the authorisation referred to in Chapter II of Law 53/2007, or having obtained it either by applying for it with false data or documents in relation to the nature or ultimate destination of such products or in any other unlawful way.
  - Council Regulation (EC) No 1236/2005 of 27 June 2005 on trade in certain products which may be used for the purpose of applying the death penalty or to inflict torture or other cruel, inhuman or degrading treatment or punishment with products listed in Annex III to that Regulation, without or having obtained it either by application with false data or documents relating to the nature or ultimate destination of such products or in any other unlawful way.

- Legislation governing foreign trade in drug precursors without the authorisations referred to in Council Regulation (EC) No 111/2005 of 22 December 2004 laying down rules for the surveillance of trade in drug precursors between the Community and third countries, or having obtained them either by application with false information or documents relating to the nature or destination of such products or in any other illicit way.

– Obtaining, or attempting to obtain, by means of a false or otherwise unlawful allegation, the release defined in accordance with the provisions of Article 123 of Regulation (EC) No 450/2008 of the European Parliament and of the Council of 23 April 2008 establishing the Community Customs Code (Modernised Customs Code), and its implementing provisions.

In the event that the object of the contraband is tobacco, it will be reproachable in criminal proceedings when the value of the same exceeds 15,000 euros.

In any case, and due to the lesser seriousness of the act, those who carry out the conduct listed above will incur an administrative offence of smuggling when the value of the goods, merchandise, goods or effects subject to them is less than 150,000 or 50,000 euros, as the case may be.

In the second case, smuggling of property the mere possession of which constitutes a crime, a non-exhaustive list is contained in article 2 of the Law on the Suppression of Smuggling. Without being an exhaustive list, and regardless of the value of the goods, smuggling shall be committed when the object of smuggling is toxic drugs, narcotics, psychotropic substances, weapons, explosives, biological agents or toxins, toxic chemicals and their precursors, or any other property the possession of which constitutes an offence, or when the smuggling is carried out through an organization, regardless of the value of the goods, merchandise or goods.
For more information, you can consult the legal text that refers to the conducts discussed directly in the Spanish Criminal Code in force BOE.es - Agencia Estatal Official State Gazette

Prohibited conduct

- Importing or exporting goods of lawful trade without presenting them to customs clearance, concealing them from the action of the customs administration.
- Carrying out acts of trade, possession or circulation of non-EU goods of lawful trade without proving their lawful importation.
- Importing or exporting goods subject to trade policy measures without complying with the applicable legal provisions or when the mandatory administrative authorisations for such import are obtained by means of false data or documents in relation to the nature or destination of the products.
- Importing, exporting, or trading prohibited goods (drugs, weapons, etc.).
- Importing excessive quantities of items whose permitted quantity is restricted to personal use (tobacco, alcohol).

What is expected of the Group's employees and related persons

That they avoid any type of practice that may involve the commission of crimes related to smuggling, ensuring that the State's interest in maintaining the integrity of the economic system protected by the customs regime is protected, as well as the interest in collecting through the tariff system.

In this sense, it is required that, during their import and export activities, they comply with financial and fiscal regulations.

In this regard, and in order to minimise any possible risk, in the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.27. Crimes of illegal trafficking in organs

Introduction and legal reference

Article 156 bis of the Criminal Code criminalizes the commission of conduct that promotes, favors, facilitates or publicizes the illegal procurement or trafficking of human organs of others or the transplantation of them, whether these are main or non-main organs.

In this sense, there may be companies that, based on their activity, and without necessarily being directly related to the procurement or legal trafficking of human organs (as could be the case of a clinic or a hospital), could present a sectoral risk of participating in practices that fall within the scope of this crime, since publicizing the activity, transport or illicit storage of this type of goods would be sufficient for the company to have to answer criminally for such action (for example, through the use of the company's means for the transport of organs; advertising that human organs can be obtained in certain countries, etc.).

It is intended to protect physical integrity and also the health system, as well as the principle of equality and the dignity of people.

The material object of the crime will be the human organs of others, defined in RD 1723/2012, of October 28, as that differentiated part of the human body made up of various tissues that maintains its structure, vascularization and capacity to develop physiological functions with a significant degree of autonomy and sufficiency, such as: kidneys, heart, lungs, liver, pancreas, intestine and others with similar criteria.

They are crimes of mere activity, of abstract danger and that will be committed by action. The criminal law refers to the administrative regulations that exist on the procurement, extraction and transplantation of organs, specifically:

- Law 30/1979, of 27 October, on organ extraction and transplantation.
- Royal Decree 1723/2012, of 28 December, which regulates the activities of procurement, clinical use and territorial coordination of human organs intended for transplantation and establishes quality and safety requirements.

Any person can commit the crime (it is a common crime), except the donor; and a mitigating rate is established in relation to the recipient.

All the criminal modalities contemplated in article 156 bis CP require malice, at least eventual, without the reckless commission being foreseen.

Provocation, conspiracy and proposition are expressly punished.

For more information, you can consult the legal text that refers to the conducts discussed directly in the Spanish Criminal Code in force [BOE.es - Agencia Estatal Official State Gazette]

Prohibited conduct

- Promoting, favouring, facilitating or publicising the illegal procurement or trafficking of foreign human organs or their transplantation.

What is expected of the Group's employees and related persons

All of them are expected to remain alert to suspicious conduct that could involve the commission or participation in the activities indicated, especially avoiding that the resources of the Group or those subcontracted for the provision of services are used to facilitate the illegal trade or transport of human organs.

In this regard, and in order to minimise any possible risk, in the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.28. Crimes of risk caused by explosives and other agents

Introduction and legal reference

Article 348 et seq. of the Spanish Penal Code ensures the safety of people and the environment, punishing those conducts that could contravene the safety standards established in the processes of manufacture, handling, transport, possession or marketing of explosives, flammable or corrosive, toxic and asphyxiating substances, or any others that may cause havoc, putting in concrete danger the life, physical integrity or health of people or the environment.

It should also be borne in mind that this offence also punishes those responsible for the surveillance, control and use of explosives or substances that may explode which, in contravention of the applicable regulations, have facilitated their effective loss or removal.

Although this crime is usually associated with explosives in its colloquial sense, there are a large number of substances whose improper storage, handling or transport are ideal for causing havoc.

Provocation, conspiracy and proposition are expressly punished.

For more information, you can consult the legal text that refers to the conducts discussed directly in the Spanish Criminal Code in force [BOE.es - Agencia Estatal Official State Gazette]

Prohibited conduct

- Causing explosions or using any other means of similar destructive power causing the destruction of buildings, public premises, warehouses containing flammable or explosive materials, means of collective transport, destruction of roads, serious disturbance of any kind or means of communication, disturbance or interruption of the supply of water, electricity or other fundamental natural resource, necessarily entailing a danger to the life or integrity of people.
- Manufacturing, handling, transporting, possessing or marketing explosives, flammable or corrosive, toxic and asphyxiating substances, or any other materials, devices or devices that may cause havoc in contravention of established safety regulations, endangering the life, physical integrity or health of people or the environment.
- To produce, import, export, market or use ozone-depleting substances.
- Facilitating the loss or theft of substances that can cause havoc, provided that the conduct is committed by those responsible for the surveillance, control and use of said substances.
- Causing a fire that endangers the life or physical integrity of people.

What is expected of the Group's employees and related persons

All of them, especially those people who, due to their position or job position, may have a special duty of vigilance on these issues, are expected to act according to the parameters of diligence appropriate to the regulations and to help reduce the risks of possible incidents in the field of explosives.

Thus, it will be specified that all in general, and, where appropriate, those responsible for safety in particular – as well as third parties responsible for the eventual storage and transport of the Group's products that may fit into the present case – comply with the regulations on the prevention of occupational risks, the environment and any other sectoral regulations, using the appropriate material for the treatment, storage and transport of material likely to cause explosions or deflagrations.

In this regard, Group Members and Related Persons are required to comply not only with the specific regulations applicable to specific products, but also those relating to the prevention of occupational risks, in terms of the Group's occupational safety, and environmental protection, all in order to minimise any possible risk.

In this regard, and in order to minimise any possible risk, in the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.29. Offences relating to nuclear energy and ionizing radiation

Introduction and legal reference

Article 343 of the Spanish Penal Code punishes those who discharge, emit or introduce into the air, soil or water a quantity of ionising materials or radiation, or expose such radiation by any other means, endangering the life, integrity, health or property of one or more people or the quality of the air, soil, water, animals or plants.

The present crime is somewhat related to what is stated in the crime against natural resources and the environment, providing a more specific vision, taking into account the extra danger that the possible leakage of radioactive material entails for the population and our environment.

It should also be borne in mind that the commission of the type may occur inadvertently, since it is not uncommon for some laboratory substances and some measuring devices, for example, or other technological components, to use or contain substances that may fit into the crime under analysis, or that may emit ionizing radiation, and may cause this type of damage, if handled or transported improperly.

For more information, you can consult the legal text that refers to the conducts discussed directly in the Spanish Criminal Code in force BOE.es - Agencia Estatal Official State Gazette

Prohibited conduct

- Exposing people to ionising radiation, endangering their life and integrity, health or property, because the installation is not registered or authorised in the corresponding register when it is mandatory.
- Having equipment in the Entity's facilities that emits ionizing radiation and that it does not have the necessary protection measures, thus exposing the workers who use it.

What is expected of the Group's employees and related persons

All of them are expected to make appropriate use and maintenance of any radioactive material and/or material equipped with radioactive isotopes, or to emit ionising radiation (measuring devices, for example) that they may have access to or make use of, as is the case with crimes against natural resources and the environment. Likewise, they must maintain control over their restricted use and scrupulously comply with their specifications for use and official maintenance plans.

In this regard, and in order to minimise any possible risk, in the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.30. Crimes against public health, drug trafficking

Introduction and legal reference

Articles 368, 369, 369 bis and 370 of the Criminal Code punish conduct relating to the manufacture and dispatch, supply or marketing of harmful substances or products that may cause havoc to health.

Thus, all those acts that are related to the trafficking of drugs, narcotics or psychotropic substances are punished: elaborating acts of cultivation, drugs, trafficking, promoting or favoring or facilitating their consumption or possessing them possess for those purposes.

Especially with regard to possible drug trafficking, it is especially important to monitor the means of storage and transport, whether their own or those of third parties (which they make use of via a contract for the provision of services, for example), as well as all their facilities and their computer resources open to third parties (social networks, forums, chats, etc.) since this type of crime could be committed in the eventuality that they were used for the storage, transfer or advertising of prohibited substances.

For more information, you can consult the legal text that refers to the conducts discussed directly in the Spanish Criminal Code in force BOE.es - Agencia Estatal Official State Gazette

Prohibited conduct

- Carrying out acts of cultivation, processing, trafficking, promotion, favouring or facilitating the illegal consumption or possession for these purposes, of toxic drugs, narcotics or psychotropic substances.

What is expected of the Group's employees and related persons

To avoid any type of practice that may involve the commission of crimes related to drug trafficking, taking extreme care in the means of storage and transport used, as well as the use that may be given to the Group's facilities and computer resources, in the event that they may be used for the conduct classified as crimes.

In this regard, and in order to minimise any possible risk, in the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.31. Crimes related to trafficking in human beings

Introduction and legal reference

Article 177 bis of the Spanish Penal Code, through this type of crime applicable to legal persons in Spain, punishes any action, committed in Spanish territory or outside it, that is carried out in relation to the recruitment, transport, transfer, harboring, reception or accommodation of any person (national or foreign) who is subjected to forced labor or services, slavery, sexual exploitation, removal of their bodily organs, celebration of forced marriages or exploitation to carry out criminal activities.

Special care must be taken in these matters in relations with Persons, establishing contractual exceptions and sufficient controls that allow them to verify that the facilities of their Related Persons comply with the health and safety parameters in accordance with the Group's internal principles and rules.

The development of an appropriate due diligence procedure for the selection of Related Persons is, on many occasions, a key factor in reducing exposure to this risk. It is, therefore, a type of crime in which the observance of surveillance and control measures, but above all those of careful and responsible selection of Related Persons, acquire capital importance.

For more information, you can consult the legal text that refers to the conducts discussed directly in the Spanish Criminal Code in force [BOE.es - Agencia Estatal Official State Gazette]

Prohibited conduct

- Recruiting, transporting, transferring, harboring, or receiving persons (nationals or foreigners) for the imposition of forced labor or services; sexual exploitation; exploitation for criminal activities; organ removal; or forced marriages.

What is expected of the Group's employees and related persons

To remain alert to the working conditions of the people under their responsibility or supervision, whether they are their own employees or personnel of Related Persons or those who act in the market on behalf of the Group, taking special care to ensure that current labour regulations and the Group's standards are complied with, especially in terms of hygiene, health and safety at work, as well as respect for working hours and the corresponding rest, working age and remuneration for work (collection/payment of salaries that comply with the law, or the absence of minors with work activity, who do not comply with the legal requirements to be able to work, etc.).

In this regard, it is important to reiterate the importance of remaining vigilant about those Related Persons who interact with the Group on a recurring basis in order to avoid possible contamination due to malpractice by such third parties, regardless of whether they are located in other jurisdictions.

In this regard, they are required to comply with the occupational risk prevention guidelines required by the Group and its managers, in order to minimise any possible risk.

In this regard, and in order to minimise any possible risk, in the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.32. Offences relating to prostitution, sexual exploitation and corruption of minors

Introduction and legal reference

Articles 187, 188, 189 and 189 bis of the Spanish Penal Code punish different conducts aimed at forcing a person of legal age to engage or remain in prostitution (through violence, intimidation, deception or abuse of a situation of need or vulnerability of the victim). Among the activities prosecuted is to encourage this type of activity.

Although these offences punish anyone who forces a person of legal age to engage in or remain in prostitution (by means of violence, intimidation, deception or abuse of a situation of need or vulnerability of the victim) must be especially alert to the possible commission of the type as, for example, a necessary cooperator.

Similarly, the involvement of minors in such activities is punished, punishing anyone who induces, promotes, favours or facilitates the prostitution of a minor or incapacitated person, or who engages in any act or action (including possession for one's own use) associated with pornographic material in the production of which minors or disabled persons in need of special protection have been used. The technological aspect is of vital importance in this modality.

In this sense, and with regard to the possible liability of legal persons in the commission of the type, this possible (necessary) cooperation must be taken into account, either of the Group or of the persons who make it up individually. It must be taken into account for these purposes that the approval or disapproval of the company with respect to the contracting of this type of service by its employees or Related Persons acting on its behalf or benefit in the context of its commercial relations with third parties could already imply a necessary collaboration of the company in the type of crime.

In this regard, it is irrelevant whether these activities are carried out outside working hours, outside the Group's facilities or financed on an individual basis.
Likewise, it is also irrelevant whether these acts are carried out in Spain or abroad, since the fact that activities linked to the crime of prostitution may be socially accepted in some jurisdictions - despite their illegality - does not exempt the legal person and/or the employee, manager or collaborator from compliance with Spanish regulations, which expressly punish such behaviour when the circumstances provided for in paragraph a) occur. Thus, the level of vigilance and control by organisations operating in such countries must be increased.

On the other hand, care must be taken regarding the use that may be made of the computer systems provided to the company's personnel for the performance of their activity, since the mere possession on the company's computers or other devices (tablets, mobile phones, etc.) of pornographic material in which minors appear or its dissemination through the entity's e-mail, could already imply the criminal liability of the legal entity if it has not taken the necessary security measures to prevent its commission.

This crime may only be committed intentionally.

For more information, you can consult the legal text that refers to the conducts discussed directly in the Spanish Criminal Code in force [BOE.es - Agencia Estatal Official State Gazette]

Prohibited conduct

- Using violence, intimidation or deception, or abusing a situation of superiority or of the victim's need or vulnerability, to determine a person of legal age to engage or remain in prostitution.
- Managing a website with clear pornographic content with minors.
- Download paedophile content via software and share the files with other users.

What is expected of the Group's employees and related persons

To remain vigilant and avoid any type of conduct that poses a risk of committing or participating in prostitution or corruption of minors, especially in the context of the development of commercial activities, celebrations, events or through the inappropriate use of the Group's computer resources.

In this regard, they are required to comply with the Group's principles of integrity and honesty, especially ensuring that the use of the goods and services that the Group makes available to its employees is efficient and appropriate for their purpose, compliance with the Group's systems regulations and the proper use of the Group's goods and equipment, the use of technological devices, applications and computer programs, without in any case allowing the download or introduction of illegal files, all in order to minimise any possible risk.
Likewise, they will make correct use of the Group's cards or funds in line with the Group's ethical values.

In this regard, and in order to minimise any possible risk, in the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.33. Hate speech, hostility, discrimination or violence offences

Introduction and legal reference

Articles 510 and 510 bis of the Penal Code punish, in general, the promotion, promotion or public incitement, whether direct or indirect, of hatred, hostility, discrimination or violence on discriminatory grounds contrary to constitutional rights and freedoms

The communication of information that encourages, promotes or incites, directly or indirectly, the above conduct, is also punishable.

It provides for the unlawfulness of the glorification of crimes of genocide, crimes against humanity and crimes against persons and property protected in the event of armed conflict, as well as the glorification of their perpetrators.

Specifically, the following are punished:

- Encouraging, promoting or inciting, publicly, directly or indirectly, hatred, hostility, discrimination or violence against a group, a part of it or against a specific person by reason of their membership of it, for racist, anti-Semitic or other reasons related to ideology, religion or beliefs, family situation, the membership of its members to an ethnic group, race or nation, their national origin, their sex, sexual orientation or identity, for reasons of gender, illness or disability.
- To produce, prepare, possess, for the purpose of distributing, providing third parties with access to, distributing, disseminating or selling writings or any other type of material or supports that are suitable for the content indicated in the previous paragraph.
- Denying, seriously trivializing or publicly glorifying crimes of genocide, crimes against humanity or crimes against persons and property protected in the event of armed conflict, or glorifying their perpetrators, when they have been committed against a group or a part thereof, or against a specific person by reason of his or her membership thereof, for racist, anti-Semitic or other reasons relating to ideology, religion or beliefs, family situation or membership of its members to an ethnic group, race or nation, their national origin, sex, sexual orientation or identity, for reasons of gender, illness or disability, when this promotes or favours a climate of violence, hostility, hatred or discrimination against them.
- Harming the dignity of persons through actions that humiliate, disparage or discredit any of the groups referred to in the previous paragraph, or of a part of them, or of any specific person by reason of their membership of them for racist, anti-Semitic or other reasons related to ideology, religion or beliefs, family situation, the membership of their members to an ethnic group, race or nation, their national origin, their sex, sexual orientation or identity, for reasons of gender, illness or disability, or produce, prepare, possess for the purpose of distributing, facilitating access to third parties, distributing, disseminating or selling writings or any other type of material or media that, due to their content, are suitable to harm the dignity of people because they represent a serious humiliation, contempt or discredit of any of the aforementioned groups, of a part of them, or of any specific person by reason of their membership of them.
- Glorifying or justifying by any means of public expression or dissemination the crimes that have been committed against a group, a part of it, or against a specific person by reason of his or her membership of that group for racist, anti-Semitic or other reasons related to ideology, religion or beliefs, family situation, the membership of its members to an ethnic group, race or nation, their national origin, their sex, sexual orientation or identity, for reasons of gender, illness or disability, or those who have participated in their execution.

In relation to this criminal offence, it should be borne in mind that the conduct referred to is that which involves disturbance of the public peace, or creates a feeling of insecurity or fear, harming the dignity of persons through humiliation, contempt for belonging to an ethnic group, race or nation, national origin, sex, sexual orientation or identity, gender, disease or disability.

Prohibited conduct

- Including on the website or social networks a news item that discriminates against a certain race.
- Include elements that generate hatred or discrimination in advertising campaigns.
- Spreading messages of hatred or discrimination towards certain groups through social networks.

What is expected of the Group's employees and related persons

That they avoid and do not tolerate any type of conduct that violates the diversity and equality of all people before the Law or poses a risk of commission or participation in activities that do not respect the diversity and equality of all people before the Law, in accordance with the rights proclaimed by the Spanish Constitution.

In this regard, they are required to respect the principles of mutual respect, honesty and integrity set out in the Group's Code of Conduct, as well as the corporate policies that develop it in the exercise of their activity, as well as the Group's specific guidelines on the recruitment of its own and self-employed staff, in order to minimise any possible risk.

In this regard, and in order to minimise any possible risk, in the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.34. Embezzlement crimes

Introduction and legal reference

Articles 432, 433, 433 bis, 434, 435 and 435 bis of the Spanish Penal Code punish damage caused to public resources or to the public treasury through an unfair administration of the same, exceeding the powers to administer them, or through the misappropriation of the resources received by any title that produces the obligation to deliver or return them, or by denying having received them.

In these conducts, in short, the misuse of public goods is punished, either by removing them, allocating them to uses outside the public function, or giving them a private application.

For more information, you can consult the legal text that refers to the conducts discussed directly in the Spanish Criminal Code in force BOE.es - Agencia Estatal Official State Gazette

Prohibited conduct

- Infringing the powers to administer the assets of others, emanating from the law, entrusted by the authority or assumed through a legal transaction, exceeding the exercise of the same, thereby causing damage to the administered assets.
- To allocate and/or allow for uses other than those for which money or goods received for the benefit of the Group or a third party were delivered.

- Appropriating for themselves or for a third party, money, effects, securities or any other movable thing that they have received for the benefit of the Group or a third party.

What is expected of the Group's employees and related persons

That they be especially cautious in the presence of situations that may fit into the requirements of the type set out above, especially those persons who, due to their position or position within the Group, have to have a special duty of diligence when managing public resources or in any other way are in charge of the public treasury.

In this regard, and in order to minimise any possible risk, in the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.35. Terrorist offences

Introduction and legal reference

The recent reform of the Criminal Code – approved by Organic Law 1/2019, which came into force on 13 March 2019 – expanded the list of crimes for which legal persons can be liable, and has extended this liability to the commission of any terrorist crime (new art. 580 bis CP), when until now it was only provided for crimes of financing terrorism. This implies that legal persons can be liable if crimes of terrorism, collaboration with terrorist acts, indoctrination, exaltation, glorification or incitement to terrorism, forgery of documents and travel for terrorist purposes are committed within them.

Articles 572, 573, 574, 575, 577, 578, 579, 580 and 580 bis refer to terrorist offences and punish the following conduct:

- Promoting, constituting, organising or directing, actively participating in or being part of, a terrorist organisation or group. Committing certain offences to:
    - Subverting the constitutional order, or suppressing or seriously destabilizing the functioning of the political institutions or the economic or social structures of the state, or forcing the public authorities to perform an act or refraining from doing so.
    - Seriously disturbing the public peace.
    - Seriously destabilising the functioning of an international organisation.
    - Provoking a state of terror in the population or in a part of it. Committing any serious crime against life or physical integrity, freedom, moral integrity, sexual freedom and indemnity, property, natural resources or the environment, public health, catastrophic risk, fire, forgery of documents, against the crown, attack and possession, trafficking and storage of arms, ammunition or explosives, and the seizure of aircraft, ships or other means of collective transport or goods, when carried out for the purposes indicated.

- Computer crimes typified in articles 197 bis and 197 ter and 264 to 264 quarter when the acts are committed for any of the following purposes:
  - Possession of elements for the purpose of committing the crime of terrorism: Stockpiling of weapons or ammunition, possession or storage of explosive, flammable, incendiary or asphyxiating substances or devices, or their components, as well as their manufacture, trafficking, transport or supply in any form, and the mere placement or use of such substances or of appropriate means or artifices; development of chemical or biological weapons, or seizing, possessing, transporting, facilitating to others or handling nuclear materials, radioactive elements or materials or equipment that produce ionizing radiation.
  - Receiving training or indoctrination for the purpose of training to carry out terrorist offences, receiving military or combat indoctrination or training, or in techniques for the development of chemical or biological weapons, for the manufacture or preparation of explosive, flammable, incendiary or asphyxiating substances or devices, or specifically designed to facilitate the commission of any such offences; carrying out any of these activities himself; moving or settling in foreign territory, for the same purpose, or to collaborate with a terrorist organisation or group, or to commit any terrorist offence.
  - Collaboration, recruitment, information and surveillance: Carrying out, soliciting or facilitating any act of collaboration with the activities or purposes of a terrorist organisation, group or element, or to commit any terrorist offences; carrying out any recruitment, indoctrination or training activity, which is aimed at or which, by its content, is suitable for inciting people to join a terrorist organisation or group, or for committing any terrorist offence; providing training or instruction on the manufacture or use of explosives, firearms or other harmful or dangerous weapons or substances, or on methods or techniques that are particularly suitable for the commission of terrorist offences with the intention or knowledge that they are to be used for that purpose.
  - Glorification of terrorism and humiliation of victims of terrorism: public glorification or justification of terrorist offences (572 to 577 CP) or of those who have participated in their execution, or the performance of acts that bring discredit, contempt or humiliation to the victims of terrorist offences or their families.
  - Dissemination of a terrorist message: Publicly disseminating messages or slogans that have as their purpose or that, due to their content, are suitable to incite others to commit any of the terrorist offences; inciting others to commit any of the terrorist offences publicly or in front of a crowd of people, or soliciting another person to commit them; acts of provocation, conspiracy and proposition to commit any of the terrorist offences.

For more information, you can consult the legal text that refers to the conducts discussed directly in the Spanish Criminal Code in force BOE.es - Agencia Estatal Official State Gazette

Prohibited conduct

- Glorifying or publicly justifying terrorist crimes.
- Participating in the execution or performance of acts that bring discredit, contempt or humiliation to the victims of terrorist offences or their families.
- Receive military or combat indoctrination or training to train to commit terrorist crimes.

What is expected of the Group's employees and related persons

That they avoid any type of practice that could involve the commission of terrorist crimes.

In the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.36. Crimes against moral integrity

Introduction and legal reference

The reform of the Penal Code operated by Organic Law 10/2022, of 6 September, on the comprehensive guarantee of sexual freedom, modified the criminal liability regime of legal persons by including in the catalogue of Crimes for which a legal person can respond crimes against moral integrity (degrading treatment) and crimes of sexual harassment.

The crime against moral integrity is regulated in article 173. 1 of the Spanish Penal Code, which punishes the following conduct:

- Inflicting degrading treatment on another person, seriously undermining their moral integrity.
- Repeatedly carrying out hostile or humiliating acts against another that, without constituting degrading treatment, involve serious harassment against the victim, within the scope of any employment or civil servant relationship and taking advantage of their relationship of superiority.
- Repeatedly carrying out hostile or humiliating acts that, without constituting degrading treatment, are intended to prevent the legitimate enjoyment of housing.

For more information, you can consult the legal text that refers to the conducts discussed directly in the Spanish Criminal Code in force BOE.es - Agencia Estatal Official State Gazette

Prohibited conduct

- Comments, jokes, statements or threats of aggressive, insulting or humiliating content to subordinates, made repeatedly and seriously.
- Degrading comments to subordinates related to their way of dressing, sexual orientation, race, culture or religion, made repeatedly and seriously.
- Using abusive, threatening or rude language repeatedly and seriously to address subordinates or colleagues.

- Repeatedly and gravely defaming or dishonoring a subordinate in front of his colleagues or other bosses (spreading malicious, insulting or slanderous rumors that undermine his reputation, image or professionalism).
- Repeatedly withholding information crucial to a subordinate's performance of his or her job or manipulating it to mislead him or her and then accuse him or her of incompetence or professional ineptitude.
- Repeatedly and seriously preventing a subordinate from making any decision or personal initiative within the framework of their responsibilities and work functions.
- Repeatedly and seriously carrying out the above conduct in front of a subordinate in order to cause voluntary resignation from the Company.
- Repeatedly and seriously inducing or inciting other superiors to whom a subordinate depends, to participate in any of the above prohibited conducts.
- Failing to comply with the Group's harassment regulations.

What is expected of the Group's employees and related persons

That they avoid any type of practice that may involve the commission of crimes against moral integrity.
In the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.37. Crimes against sexual harassment

Introduction and legal reference

The reform of the Criminal Code operated by Organic Law 10/2022, of 6 September, on the comprehensive guarantee of sexual freedom, modified the criminal liability regime of legal persons by including in the catalogue of crimes for which a legal person can respond crimes against moral integrity (degrading treatment) and crimes of sexual harassment.

Crimes related to sexual harassment are regulated in article 184 of the Spanish Penal Code, which punishes the following conduct:

- Soliciting favours of a sexual nature, for oneself or for a third party, within the scope of a continuous or habitual employment, teaching or service provision relationship, and with such behaviour causing the victim an objective and seriously intimidating, hostile or humiliating situation.
- The conduct is considered to be punishable by an aggravated penalty: (i) if the perpetrator of sexual harassment has committed the act by taking advantage of a position of superiority at work, teaching or hierarchical status, or with the express or tacit announcement of causing the victim harm related to the legitimate expectations that the victim may have in the context of the aforementioned relationship (ii) when the victim is especially vulnerable, by reason of his or her age, illness or situation.

For more information, you can consult the legal text that refers to the conducts discussed directly in the Spanish Criminal Code in force [BOE.es - Agencia Estatal Official State Gazette]

Prohibited conduct

Verbal behaviors:

- Offensive sexual jokes and comments about the worker's physical appearance or sexual condition.
- Obscene sexual comments
- Questions, descriptions, or comments about sexual fantasies, preferences, and abilities/abilities
- Spreading rumors about people's sex lives.
- Communications (phone calls, emails, etc.) of sexual and offensive content
- Behaviours that seek to humiliate or humiliate the worker because of their sexual condition
- Invitations or pressure to arrange dates or sexual encounters
- Invitations, requests or demands for sexual favours when they are related, directly or indirectly, to the professional career, the improvement of working conditions or the preservation of the job.
- Persistent invitations to participate in social or recreational activities, even if the person who is the subject of them has made it clear that they are unwanted and inappropriate.

Nonverbal behaviors:

- Use of images, photographs or drawings of sexually explicit or suggestive content.
- Obscene gestures, whistles, gestures or immodest looks
- Offensive letters, notes, or emails with sexual content.
- Behaviours that seek to humiliate or humiliate the worker because of their sexual condition.

Physical behaviors:

- Deliberate and unsolicited physical contact (pinching, touching, unwanted massage, etc.) or excessive or unnecessary physical approach.
- Cornering or deliberately seeking to be alone with the person unnecessarily.
- Intentionally or "accidentally" touching the sexual organs.

What is expected of the Group's employees and related persons

Everyone is expected to avoid any type of practice that may involve the commission of crimes related to sexual harassment.

In the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions, it is necessary to immediately contact the Equality Commission, or failing that, the Head of Human Resources who will appoint an independent external party to process the case. Although within the organisation these are the bodies responsible for processing complaints in these matters, it may also be brought to the attention of the Regulatory Compliance Unit through the Ethics Channel.

5.38. Crimes against workers' rights

Introduction and legal reference

This crime does not generate criminal liability for the legal person but its analysis has been included in the scope of the work due to the possible legal consequences contained in Article 129 of the Penal Code through which certain measures can be imposed against the legal person such as closure of the company, dissolution, suspension of activities, etc.

Articles 311, 311 bis, 312, 313, 314, 315, 316, 317 and 318 refer to offences against workers and punish the following conduct:

- Working conditions contrary to workers' rights: (i) through deception or abuse of a situation of necessity, imposing on the workers in their service working or Social Security conditions that harm, suppress or restrict the rights they have recognised by legal provisions, collective agreements or individual contracts. (ii) hiring workers without registering with Social Security and hiring workers without a work permit, provided that, in both cases, a minimum number of them is reached in proportion to the total number of workers in the company.
- Against immigrant workers or minors: repeated hiring of foreigners without a work permit and irregular hiring of minors.
- Illegal trafficking in labour: illegally trafficking in labour or recruiting persons or causing them to leave their jobs by offering deceptive or false employment or working conditions, and employing foreign nationals without a work permit under conditions that prejudice, suppress or restrict the rights they have recognised by law, collective agreements or individual contracts.
- Imposition of irregular working conditions on foreign workers without a work permit: employing foreigners without a work permit in conditions that prejudice, suppress or restrict the rights they have recognized by legal provisions, collective agreements or individual contracts).
- False Offer of Employment: Offering misleading or false employment or working conditions.
- Favouring emigration, by means of a false offer of employment: determining or favouring the emigration of a person to another country by simulating a contract or placement, or using another similar deception.
- Discrimination in employment: on the basis of their ideology, religion or beliefs, their belonging to an ethnic group, race or nation, their sex, sexual orientation, family situation, illness or disability, for holding the legal or trade union representation of the workers, for being related to other workers of the company or for the use of any of the official languages within the Spanish State).
- Offences against freedom of association and the right to strike: limitation by deception or abuse of necessity, coercion (by deception or abuse of a situation of necessity, preventing or limiting the exercise of freedom of association or the right to strike).
- Coercion to strike: acting in a group or individually, but in agreement with others, coercing other people to start or continue a strike.
- Infringement of occupational risk prevention regulations: in breach of occupational risk prevention regulations and being legally obliged, they do not provide the necessary means for workers to carry out their activity with the appropriate safety and hygiene measures, thus seriously endangering their life, health or physical integrity. This crime can be committed recklessly.

In order to encourage the punishment of any conscious involvement in the commission of the acts, thus extending the effectiveness of the provision, article 318 of the Criminal Code establishes that when the acts are attributed to legal persons, the penalty indicated shall be imposed on the administrators or persons in charge of the service who have been responsible for them and who, knowing them and being able to remedy them, have not taken measures to do so.

In other words, the perpetrator will not necessarily be the legal representative of the company or corporate entity, but can be any person responsible for the worker who, having knowledge of the situation and could have avoided or remedied it, has not done so or at least tried to do so.

For more information, you can consult the legal text that refers to the conducts discussed directly in the Spanish Criminal Code in force BOE.es - Agencia Estatal Official State Gazette

Prohibited conduct

- To deceive or abuse an employee's situation in order to impose working conditions that harm, suppress or restrict the rights they have recognised in current regulations or in labour agreements in force.
- Giving simultaneous employment to a plurality of workers without notifying their registration in the Social Security system or without having obtained the corresponding work permit.
- Maintain working conditions that are harmful to employees when they have joined the Group in the event of a transfer of companies.
- Illegally assigning to workers.
- Offering false or misleading working conditions to a person to induce them to leave their job.
- Simulating a contract or placement in a way that favours the emigration of a person to another country.
- Seriously discriminating against a person in employment on the basis of their sex, ideology, religion, beliefs, ethnicity, race, nationality, sexual orientation, family situation, illness, disability, position of union or employee representation, relationship with any other employee of the Group or for using any of the official languages in Spain.
- To prevent or limit, by any means, the exercise of the right to strike or freedom of association.
- Coercing or pressuring employees to start or continue a strike.
- Carrying out work without the obligatory and necessary safety elements for the prevention of occupational risks and health and safety at work.
- Carrying out a job without the supervision or supervision of the person responsible for the safety of the same.
- Failure to provide the necessary means for workers to carry out their activity with appropriate safety and hygiene measures.
- Not using the safety and hygiene means provided.
- Failing to comply with the obligations to supervise health and safety in business activity.
- Disobeying any order given by the corresponding administrative authority, which seriously endangers the health, life or physical safety of workers.

- Repeatedly giving occupation to foreign citizens or minors without a work permit.
- Preventing or limiting the exercise of freedom of association or the right to strike.
- Not requiring subcontracted entities to provide mandatory documentation in accordance with applicable regulations on safety, health and hygiene at work.
- Not requiring subcontracted entities to comply with the applicable regulations on safety, health and hygiene at work.
- Failure to supervise compliance by subcontracted entities with occupational risk prevention regulations.
- Failing to comply with internal procedures on health, safety and hygiene at work.
- Obstructing any type of inspection activity.

What is expected of the Group's employees and related persons

That they avoid any type of practice that may involve the commission of crimes against workers' rights.

In this sense, they are required to comply with the values expressed in the Code of Conduct, and the corporate policies that develop it on human resources management in order to minimize any possible risk

In the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.39. Crimes of price alteration in public tenders and auctions

Introduction and legal reference

This crime does not generate criminal liability for the legal person but its analysis has been included in the scope of the work due to the possible legal consequences contained in Article 129 of the Penal Code through which certain measures can be imposed against the legal person such as closure of the company, dissolution, suspension of activities, etc.

Article 262 of the Spanish Penal Code refers to the crime of price alteration in public tenders and auctions and punishes the conduct of:

- Soliciting gifts or promises not to take part in a public tender or auction.
- Trying to keep bidders away from it by means of threats, gifts, promises or any other artifice.
- To agree with each other in order to alter the price of the auction, to go bankrupt.
- Fraudulently abandoning the auction having obtained the award.

There are therefore four different actions that are penalized, with a common necessary presupposition, the existence of a public bankruptcy or auction, except in the case of bankruptcy or abandonment of the auction, referring only to public auctions and not to bankruptcy.

Private tenders and auctions are excluded from this type of crime, understood as those to which fully identified persons are invited, without any other undetermined person having access to said auction, without prejudice to the fact that if any of the conducts described here are carried out, they may constitute other crimes such as threats or coercion.

For more information, you can consult the legal text that refers to the conducts discussed directly in the Spanish Criminal Code in force BOE.es - Agencia Estatal Official State Gazette

Prohibited conduct

- Offering any advantage or benefit (economic or otherwise) to companies, managers, employees or their relatives who enter a tender or auction in order for them to abandon it.
- Threatening, engaging in aggressive or violent conduct against other bidders, their employees, managers, workers or family members, who present themselves to a public tender or auction in order to make them abandon it.
- Reaching agreements, developing policies, carrying out actions or any other cooperating, complicit or inducing conduct to alter the price of an auction in an auction or public tender.
- Falsifying any data or documentation and/or submitting false documentation in bids in order to be awarded a public tender or auction.

What is expected of the Group's employees and related persons

That they avoid any type of practice that may involve the commission of crimes: alteration of prices in public tenders and auctions. Specifically, they will ensure and comply with the following guidelines of conduct:

- Prohibition of soliciting any type of benefit or advantage, for oneself or for the Group, in exchange for not taking part in a public tender or auction.
- Prohibition of trying to keep other bidders away from a public auction by means of threats, gifts, promises or any other artifice, or agreeing with them with the aim of altering the price of the auction, fraudulently abandoning the auction having obtained the award.

In the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.40. Crimes of obstruction of inspection activity

Introduction and legal reference

This crime does not generate criminal liability for the legal person but its analysis has been included in the scope of the work due to the possible legal consequences contained in Article 129 of the Criminal Code through which certain measures can be imposed against the legal person such as closure of the company, dissolution, suspension of activities, etc.

Article 294 of the Spanish Penal Code refers to the corporate crime that punishes the conduct of denying or impeding the action of the persons, bodies or entities that inspect or supervise, being a de facto or de jure administrator of any entity incorporated or in formation, subject to or acting in markets subject to administrative supervision.

The conduct consists of denying or preventing the inspection or supervisory action. It is an act of disobedience that is committed both with the open refusal to act, and, without expressly denying it, in fact directly or indirectly preventing the action of the agents or inspectors. It is a necessary requirement that the refusal to the supervisory activity be malicious or intentional, that is, malicious. There will be no doubt about the knowledge of the obligation to allow the administrative supervisory action, since it will previously carry a requirement or notification of said action that will dispel any doubt about its reality and legality.

For more information, you can consult the legal text that refers to the conducts discussed directly in the Spanish Criminal Code in force BOE.es - Agencia Estatal Official State Gazette

Prohibited conduct

- Denying or impeding in any way the possible inspection work or the investigative tasks of the official inspection bodies or of the subjects to whom such function has been entrusted.
- Failure to provide information required by the authorities.
- Obstructing the supervisory action of inspectors.

What is expected of the Group's employees and related persons

That they avoid any type of practice that may involve the commission of the crime of obstruction of inspection activity.

In the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.41. Crimes related to genetic manipulation

Introduction and legal reference

This crime does not generate criminal liability for the legal person but its analysis has been included in the scope of the work due to the possible legal consequences contained in Article 129 of the Penal Code through which certain measures can be imposed against the legal person such as closure of the company, dissolution, suspension of activities, etc.

Articles 159, 160, 161 and 162 of the Spanish Penal Code refer to crimes related to genetic manipulation that punish the following conduct:

- Genotype alteration: Manipulating human genes by altering the genotype for a purpose other than the elimination or reduction of defects or serious diseases.
- Use of genetic engineering to produce biological weapons or exterminators of the human species.
- Assisted reproduction without consent: Fertilizing human eggs for any purpose other than human procreation.
- Performing assisted reproduction on a woman without her consent.

The Council of Europe, in the "Convention for the Protection of Human Rights and Dignity of the Human Being with regard to the Applications of Biology and Medicine", only admits interventions on the human genome for preventive, diagnostic or therapeutic reasons and only when it is not intended to introduce a modification in the genome of the offspring.

Spanish legislation allows the use of assisted reproduction techniques when they are scientifically accredited, clinically indicated and have as their purpose "the prevention and treatment of diseases of genetic origin, provided that there are sufficient diagnostic and therapeutic guarantees and they are duly authorized".
Therapeutic techniques on the live pre-embryo in vitro may only be intended to treat a disease or prevent its transmission and may not be authorised if they modify the non-pathological hereditary characteristics or seek the selection of individuals or breed.

For more information, you can consult the legal text that refers to the conducts discussed directly in the Spanish Criminal Code in force BOE.es - Agencia Estatal Official State Gazette

Prohibited conduct

- Manipulating human genes in such a way that the genotype is altered, for purposes other than the elimination or reduction of defects or serious diseases.
- Use of human genes for a purpose other than purely medical or therapeutic purposes, subsequently altering and manipulating the human genotype.
- Performing assisted reproduction on a woman without her express consent.

What is expected of the Group's employees and related persons

That they avoid any type of practice that may involve the commission of crimes of genetic manipulation.

In the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

5.42. Crimes related to criminal organizations and groups

Introduction and legal reference

This crime does not generate criminal liability for the legal person but its analysis has been included in the scope of the work due to the possible legal consequences contained in Article 129 of the Penal Code through which certain measures can be imposed against the legal person such as closure of the company, dissolution, suspension of activities, etc.

Articles 570 bis, 570 ter and 570 quarter of the Spanish Penal Code punish conduct relating to promoting, constituting, organising, coordinating or directing, financing or integrating a criminal organisation or terrorist group.

A criminal organisation is a group made up of more than two people on a stable basis or for an indefinite period of time, who in a concerted and coordinated manner share various tasks or functions with the aim of committing crimes. Spanish criminal legislation must be interpreted in this matter in the light of the 2000 United Nations Convention against Transnational Organized Crime in New York, signed by Spain in Palermo in 2000 and ratified by the 2002 Instrument, known as the Palermo Convention, which constitutes the law in force in our country.

They are crimes of mere activity or danger in which the consummation occurs from the moment that some form of collaboration or participation in the criminal organization or group is carried out, without it being required that the crimes that constitute the object of its illicit activity be executed or initiated (Attorney General's Office Circular 2/2011).

These criminal types require specific intent consisting of the purpose or object of committing crimes

For more information, you can consult the legal text that refers to the conducts discussed directly in the Spanish Criminal Code in force BOE.es - Agencia Estatal Official State Gazette

Prohibited conduct

- Any form of promotion, constitution, coordination, direction, financing or integration of criminal groups or organisations or terrorist groups or organisations.

What is expected of the Group's employees and related persons

That they avoid any type of practice that may involve the commission of crimes related to criminal organizations and groups.

In the event of doubts (as to whether or not an action or omission may incur in any type of prohibited activity) or suspicions that a risk of criminal imputation may be incurred, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the Ethics Channel.

6. Communication and reporting

In the event of detecting the commission of any of the prohibited conducts included in the catalogue or any conduct not listed therein, but which there are doubts or suspicions of being able to constitute a risk of criminal imputation for the person who executes it or for the Group, such risky conduct must be immediately reported to the Regulatory Compliance Unit through the following mechanisms:

- Whistleblowing Channel Application: Accessible from the Intranet and the Employee Portal.
- Email: canaldenuncias@grma.masaveu.com
- Postal mail: A/A CANAL ÉTICO C/Cimadevilla, 8 33003 Oviedo (Asturias)

Likewise, through the Ethics Channel, employees can consult their doubts or propose improvements in the Group's existing systems in the areas covered by this Code.

7. Non-compliance

In any case, non-compliance with the Code of Conduct and the regulations that develop it, including this procedure, will be assessed and sanctioned in accordance with internal regulations, applicable agreements and, where appropriate, the legal regulations in force, in accordance with the Protocol of action in the event of non-compliance with the Regulatory Compliance and Criminal Prevention Model of the Corporación Masaveu Group and the Disciplinary System of the Regulatory Compliance and Criminal Prevention Model of the Corporación Masaveu Group.