



**CODE OF CONDUCT AND RESPONSIBLE
PRACTICES**

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1. DEFINITION AND OBJECTIVES

The "Code of Conduct and Responsible Practices of HASENKAMP RELOCATION SERVICES SPAIN, S. L." (hereinafter referred to as the Code) is the result of the recasting of all standards of conduct developed in the internal protocols of the entity.

The Code establishes the criteria of performance to be observed by employees of HASENKAMP RELOCATION SERVICES SPAIN S. L., (hereinafter HASENKAMP) in the performance of their professional responsibilities.

The ultimate objective of this Code is to ensure professional, ethical and responsible conduct on the part of HASENKAMP and all its employees in the development of their activities as a basic element of its corporate culture on which the training and personal and professional development of its employees is based. With this objective, the Code defines the principles and values that must govern HASENKAMP's relations with its stakeholders (employees, customers, suppliers and those companies in which it develops its business model).

For this purpose, the Code:

- Facilitates the knowledge and application of HASENKAMP's corporate culture, which is firmly rooted in the fulfilment of human and social rights and in the effective integration of the entire group of employees into HASENKAMP, respecting their diversity.

- Establishes the principles of due diligence for the prevention, detection and eradication of irregular conduct, whatever its nature, including, among others, risk analysis, the definition of responsibilities, the training of employees and, where appropriate, third parties directly related to HASENKAMP, and the formalization of procedures, in particular, for the notification and immediate elimination of irregular conduct.

- Takes into account the principle of criminal liability of legal persons, as established in the Spanish legal system where HASENKAMP operates, prevents, and proscribes the existence of conduct that may determine the liability of HASENKAMP among its legal representatives, directors, managers, employees or by any other person subject to the authority of HASENKAMP personnel.

- The employees should always be guided by the following basic principles:
 - a) To avoid any conduct that could damage or jeopardize HASENKAMP or its reputation.
 - b) To always act legally and honestly.

- c) To prioritize the interests of the company over personal or other interests.

2. SCOPE OF APPLICATION

The Code applies to HASENKAMP and binds all its personnel, regardless of their position and role within HASENKAMP.

The application of the Code, in whole or in part, may be extended to any natural and/or legal person related to HASENKAMP, when this is appropriate for the fulfilment of its purpose and is possible due to the nature of the relationship.

For the purposes of this Code, references to the term "employees" include both employees, external collaborators and the management of HASENKAMP.

The Code will be personally notified to all of its Directors, employees, and any person related to HASENKAMP when required by the nature of their relationship, who must in turn make a written commitment to comply with it. The obligation to comply with it will likewise be expressly included in the employment contracts of the employees, who will be given a copy thereof upon joining HASENKAMP.

Exemption from compliance, in specific and duly justified cases, may solely be authorized by the Compliance Committee, which must inform the Directors as soon as possible.

3. GENERAL PRINCIPLES

- a) **Principle of good governance:** HASENKAMP is committed to national and international recommendations on good governance as well as to the principles of corporate social responsibility, ethics and transparency in all areas of activity.
- b) **Principle of commitment to constitutional rights:** HASENKAMP manifests its commitment and ties to constitutional rights, such as the right of opinion, association, expression, intimacy, image, secrecy of communications and dignity of its workers, with the scope and content that the Constitutional Court confers on them in the work environment.
- c) **Principle of social commitment:** HASENKAMP is constantly striving for commitment to its project, the maintenance and strengthening of belief in the work carried out and in being able to improve day by day. HASENKAMP's work culture is complemented and defined by its values, ethical commitment and excellent personal treatment.
- d) **Principle of reconciling personal, family and work life:** HASENKAMP respects the personal and family life of its employees and promotes actions that facilitate a responsible balance between personal and work life.
- e) **Principle of equal opportunities:** HASENKAMP promotes equal treatment between men and women as regards access to employment, training, promotion of professionals and working conditions, extending the scope of this principle to public tenders for the acquisition of goods and services.
- f) **Principle of relational integrity:** All those persons who have a relationship with HASENKAMP are obliged to carry out their activities following the highest

ethical standards, with honesty and inspiring trust, with coherent and unwavering behaviour, always ensuring HASENKAMP's good reputation.

- g) **Principle of public interest:** Inspire all actions in such a way as to pursue the general interest over self-interest, avoiding the use of public resources for the satisfaction of personal interests.
- h) **Principle of intimacy:** HASENKAMP respects the right to the privacy of its employees in all its manifestations, especially with regard to personal, medical and economic data. It therefore undertakes not to disclose personal data except with the consent of the interested parties and in cases of legal obligation or compliance with judicial or administrative decisions. Furthermore, under no circumstances may personal data be processed for purposes other than those provided for by law or contract. By the same token, professionals and employees who access the personal data of other professionals are subject to the confidentiality clause and commitment to maintain confidential data secret.
- i) **Principle of health and safety in the workplace:** HASENKAMP, promotes as an essential part of its activity, safety and health at work and applies, in collaboration with its employees, the preventive measures established in this respect under current legislation and any others that may be established in the future, ensuring that these are strictly observed by employees

4. RELATIONAL SPHERE

4.1. RELATIONS WITH EMPLOYEES

HASENKAMP considers the wellbeing and health of its employees to be of paramount importance to their success and works actively to eliminate health risks and to create a safe working environment.

- a. Safety in the workplace is an indisputable condition and a mutual responsibility shared by all HASENKAMP employees.
- b. Employees must improve any processes for the prevention of injury, illness, death, property damage or environmental damage, paying due attention to all safety standards and regulatory requirements. Any incidents relating to environment or safety issues should be reported.
- c. HASENKAMP recognizes the rights of its employees to form or join trade unions in accordance with the laws and principles of each country.
- d. HASENKAMP employees have the right to unionise, to freedom of association and of collective bargaining.
- e. Employees must be treated with respect and dignity.

No person in the employ of HASENKAMP shall be discriminated against on

the basis of race, physical disability, illness, religion, sexual orientation, political opinion, age, nationality or gender.

HASENKAMP prohibits all forms of physical, sexual, psychological or verbal abuse or harassment of its employees, as well as any other conduct that could create an intimidating, offensive or hostile work environment.

Weekly working hours and overtime will not exceed the legal limit established by Spanish legislation. Overtime shall always be voluntary and paid in accordance with the Law.

The salary received by HASENKAMP employees is in accordance with the function performed, always respecting the agreement of the sector in Spain.

HASENKAMP regards people as a key business factor, defends and promotes compliance with human and labour rights and is committed to the application of standards and good practices in terms of employment conditions and health and safety in the workplace.

HASENKAMP's staff will cooperate in strict compliance with the requirements of the applicable labour norms and in the prevention, detection and eradication of irregularities in this area. All employees are obliged to act in their working relationships with other employees, **according to criteria of respect, dignity and fairness**, taking into account the different cultural sensitivities of each person and not allowing any form of violence, harassment or abuse at work, no discrimination on the basis of race, religion, age, nationality, gender or any other personal or social condition unrelated to their merit and capacity, with special consideration for the care and integration into the labour market of persons with disabilities or handicaps.

All employees are responsible for complying strictly with occupational health and safety standards and for ensuring their own safety and that of those affected by their activities.

The **use of substances** that may affect the proper fulfilment of professional obligations **are prohibited**, as well as attendance at work under the influence of alcohol or any illegal drug or prohibited substance.

Substance abuse, including the use of alcohol and illegal drugs on the job or affecting professional performance, is strictly prohibited.

HASENKAMP has zero tolerance for the use of illegal drugs and alcohol or other substances. Violation of this rule could be grounds for dismissal with justified cause.

Employees may not be influenced by receiving favours or attempting to improperly influence others by delivering favours.

Employees may only offer or accept gifts the value of which is less than 50€ (fifty). In the event that a gift of a higher amount is to be made or accepted, the Compliance Committee will be requested to authorize it in writing, provided that it is socially appropriate and in accordance with HASENKAMP's activity and purposes.

Whenever a gift is received or offered, regardless of the person who delivers/receives it and/or the value it may have, an e-mail should be sent to the Compliance Committee informing as to the following points:

- a. Name of the person who made the gift.
- b. Who the gift is for.
- c. Content.

The receipt or making of the following gifts is prohibited:

- d. Money (in whichever form it is given)
- e. Those which may be out of context within the business environment and which violate criteria of social appropriateness.
- f. Prohibited substances.

Gifts that have or could have the purpose of carrying out a preferential job (e. g. faster service or bypassing the normal protocol) or gifts that may affect decision-making in the normal HASENKAMP environment (e. g. applying more favourable conditions to one supplier than others) should not be received.

Should a HASENKAMP employee receive a gift that meets the above conditions, he or she must return it in the same manner as he or she received it. In the event of impossibility or discomfort, the Compliance Committee should be informed immediately.

4.2 CLIENT/PARTNER RELATIONS

HASENKAMP will treat all customers fairly and in compliance with the Law.

All employees are obliged to act according to criteria of consideration, respect and dignity in their relations with customers, taking into account the different cultural sensibilities of each person and not allowing discrimination in treatment on the basis of race, religion, age, nationality, gender or any other personal or social condition prohibited by Law, with special consideration to the attention of those persons with disabilities or handicaps.

In the course of their business activities, HASENKAMP employees will promote HASENKAMP's products on the basis of objective standards, without distorting their conditions or characteristics. HASENKAMP's promotional activities shall be carried out in a clear manner so as not to provide false, misleading or erroneous information to customers or third parties.

All personnel are obliged to ensure the security of the payment methods used at HASENKAMP in order to guarantee the proper functioning and traceability of invoicing and collection procedures, the protection of customer data and prevention of fraud.

4.3 SUPPLIER RELATIONS

HASENKAMP suppliers are obliged to comply with this Code, when applicable.

HASENKAMP employees will interact with their suppliers of goods and services in a lawful, ethical and respectful manner.

The **selection of suppliers** will be governed by criteria of objectivity and transparency, reconciling HASENKAMP's interest in obtaining the best conditions, with the convenience of maintaining stable relationships with ethical and responsible suppliers, and will always follow the internal procedure established in the internal protocol.

In the **awarding of contracts**, HASENKAMP and its employees must consider factors such as the need for services, total cost, quality and reliability. When necessary, a cost-benefit analysis will be carried out.

In all cases, the procedure for contracting suppliers established in the

"Purchasing, Expenses and Contracting Protocol" implemented in HASENKAMP will be followed.

All decisions taken in this field must be accredited, in the sense that they must be justifiable, demonstrable and verifiable in the event of review by third parties or by HASENKAMP's own supervisory bodies. HASENKAMP personnel have an obligation to protect commercially sensitive information regarding the conditions established by HASENKAMP in relation to its supply chain.

HASENKAMP employees shall not solicit or accept information from suppliers regarding the terms and conditions of other companies competing with HASENKAMP.

No HASENKAMP employee may offer, grant, solicit or accept, directly or indirectly, **gifts or gratuities, favours** or compensations, in cash or in kind, whatever their nature, that may influence the decision-making process related to the performance of the functions derived from their position.

Any gifts or gratuities received in contravention of this Code must be immediately returned and reported to the Compliance Committee. If it is not reasonably possible to return the gift or gratuity, it will be delivered to the HR department, which, upon issuing the corresponding receipt, will use it for purposes of social interest.

In particular, no HASENKAMP employee may offer, grant, solicit or accept gifts, or gratuities from a natural or legal person with whom HASENKAMP maintains a relationship of any kind that, alone or in combination with each other over a period of one year, are worth more than 100€ (one hundred). Gifts in cash are expressly prohibited, as well as gifts that are not socially appropriate.

4.5 RELATIONS WITH AUTHORITIES AND CIVIL SERVANTS

Relations with authorities, regulatory bodies and public administrations shall be based on the principles of cooperation and transparency. HASENKAMP employees will interact with public authorities and institutions in a lawful and ethical manner, respecting the laws for the prevention of corruption and bribery.

HASENKAMP employees **will interact** with public authorities and institutions in a lawful, ethical, respectful manner and in line with national and internal provisions for the prevention of corruption and bribery. Employees who deal with representatives of public administrations should have read the anti-corruption code developed by HASENKAMP, in particular the "Anti-fraud and anti-

corruption protocol".

Personnel who have relations with public administrations must document the decisions taken and demonstrate compliance with applicable internal and external standards, with the aim of facilitating third parties and HASENKAMP's control bodies to review regulatory compliance in this area.

As a general rule, no HASENKAMP employee may offer, grant, solicit or accept, directly or indirectly, **gifts or gratuities, favours or compensations**, whatever their nature, to any authorities or officials.

HASENKAMP employees shall refrain from making **payments** to facilitate or expedite procedures, consisting of the delivery of money or other things of value, whatever their amount, in exchange for insuring or expediting the course of a procedure or action, whatever their nature, to any judicial body, public administration or official body.

Any direct or indirect participation in bribery, acts of bribery, kickbacks, indirect contributions or similar payments is expressly prohibited.

HASENKAMP employees must refrain from engaging in any activity or conduct that could give rise to the appearance or suspicion of such conduct or an attempt to engage therein.

Employees should be aware that offering or delivering improper benefits in order to influence the recipient's decision, even if the recipient is not a civil servant, may not only result in disciplinary sanctions but also result in the filing of criminal charges.

Improper benefits may include anything that could be of value to the recipient, including employment contracts or consultancies.

The use of HASENKAMP funds or assets for any illegal or improper purpose is strictly prohibited, and it is the responsibility of the financial department to carry out the internal controls necessary to guarantee this prohibition.

Employees shall avoid undue tax advantages for HASENKAMP and shall ensure that the information disclosed to the authorities in this respect is truthful and accurately reflects the reality of HASENKAMP. They shall also ensure that the aid applied for or received from public administrations is put to appropriate use and that its application be transparent, avoiding any distortion of the conditions for obtaining it or giving it a use other than that for which it was granted.

5. RULES OF CONDUCT AND RESPONSIBLE PRACTICES

5.1. COMPLIANCE WITH APPLICABLE LEGISLATION AND INTERNAL REGULATIONS

Regulatory compliance is a necessary part of this Code. All HASENKAMP employees must comply with current legislation.

All HASENKAMP employees must comply with the rules and procedures established, as well as any instructions that may be approved in the development of these.

To facilitate proper internal control, the decisions of HASENKAMP employees will be traceable from the point of view of regulatory compliance, so that the adequacy of decisions for internal and external standards is justifiable, demonstrable and verifiable in the case of review by competent third parties or HASENKAMP.

HASENKAMP undertakes to make every effort to ensure that its employees know and understand the internal and external regulations necessary for the execution of their responsibilities.

In the event of non-compliance with the Code, HASENKAMP has an ethical channel that allows anyone connected with HASENKAMP to report, in confidence, any irregularity that, in his/her opinion, constitutes a violation of the Code

5.2. THE ENVIRONMENT

HASENKAMP's Corporate Social Responsibility, understood as its environmental commitment in the development of its activities and for the benefit of all its stakeholders, is an inseparable part of its business model.

HASENKAMP is committed to minimizing the environmental impact throughout the development of its activity.

5.3. MARKET PRACTICES

HASENKAMP's directors and employees undertake to comply with all applicable antitrust and competition protection laws which prohibit agreements or actions which restrict trade unreasonably, are deceptive or misleading, or unreasonably restrict competition without providing beneficial effects to consumers.

Practices such as price-fixing, collusion in a tender procedure (collusive bidding) and market/customer sharing are therefore strictly prohibited.

Similarly, our competitors will not be denigrated, diminished or intentionally defamed when we enter into a dialogue with customers; we do not undertake to provide a service that we are unable to provide, nor do we claim that HASENKAMP is accredited to provide a particular service, without having previously checked it.

With regard to free competition, HASENKAMP is firmly committed to free competition and fair behaviour in the markets. Accordingly, whenever HASENKAMP participates with one or more competitors to develop a business operation, the recipients of this code of conduct shall refrain from engaging in any anti-competitive practice which favour the interests of HASENKAMP.

The following are considered anti-competitive practices:

- a. Obtaining information about the competitor's product or offer illegally.
- b. Consultation with one or more competitors to fix prices or other determinants of the bid for which they compete.
- c. The dissemination of false or misrepresented information that is prejudicial to one or more competitors.
- d. Misleading advertising of their business and any conduct which may constitute an abuse or illegal restriction of competition.

Trade policy and prices will be independently established and never accorded with competitors or other unrelated parties either directly or indirectly, customers will never be distributed between HASENKAMP and its competitors but will always be the result of fair competition.

All employees, but in particular those engaged in sales and purchasing activities or those in frequent contact with competitors, should ensure that they are familiar with the applicable competition laws and should contact the Management in case of doubt.

HASENKAMP competes fairly in the market and under no circumstances admits any deceptive, fraudulent or malicious conduct.

HASENKAMP employees will always seek commercial or market **information** without infringing the rules that could protect them. Employees shall reject competitor information obtained improperly or in violation of the confidentiality by which it is maintained by its rightful owners. In particular, special care will be taken not to violate trade secrets in cases of incorporation into HASENKAMP of professionals from other companies in the sector.

HASENKAMP employees shall also avoid spreading malicious or false information about HASENKAMP competitors.

In their dealings with third parties, HASENKAMP employees will avoid cash payments in general. They shall also subject to special control and supervision of any unforeseen payments made to or by third parties not mentioned in the corresponding contracts, to accounts other than those that are customary in relations with a particular organisation or person, payments made to or by persons, companies, entities or accounts opened in territories classified as tax havens, and payments made to organisations where it is not possible to identify the partner, owner or ultimate beneficiary.

5.4. TRANSPARENCY

HASENKAMP's relations with suppliers and public administrations will be developed under the principles of cooperation and transparency.

HASENKAMP will report truthfully, appropriately, usefully and consistently with respect to its aims, activities and projects. Transparency of information is a basic principle that should govern the performance of all members of the entity.

The economic-financial information of the entity shall faithfully reflect its economic, financial and equity reality in accordance with generally accepted accounting principles. It will submit its annual accounts to an external audit, without prejudice to compliance with its legal obligations.

HASENKAMP's financial records are the basis for managing the company's business and fulfilling its obligations to various stakeholders. Therefore, all financial records must be accurate and in accordance with HASENKAMP's accounting principles.

HASENKAMP strongly rejects practices that may be considered irregular in the development of its relations with suppliers, intermediaries or representatives, agents, etc., including those related to tax fraud, money laundering, etc.

5.5. CONFLICTS OF INTEREST

HASENKAMP employees should avoid situations that could cause a conflict between their **personal interests and those of HASENKAMP**. They must also refrain from representing it and from intervening or influencing the taking of decisions in which, either directly or indirectly, they or a third party linked to them, have a personal interest. They will not be able to use their position in the company to obtain financial or personal advantages or business opportunities of their own.

Specific potential situations of conflict that should be reported to the Compliance Committee are as follows:

- a. The performance by the employee or persons related to him/her, directly or indirectly, by him/herself or through any company or institution, of activities that constitute the same, analogous or complementary type of activity as that developed by HASENKAMP.
- b. The performance by the employee or by persons related to him/her, directly or indirectly, by him/herself or through any company or institution, of activities that generate the exchange of goods and/or services with HASENKAMP, whatever the agreed system of remuneration.

Every employee must ensure that the measures and decisions taken within his or her scope of responsibility are free from the influence of interests that could reasonably be considered a conflict of interest with HASENKAMP.

5.6. EXECUTION OF OTHER ACTIVITIES

HASENKAMP employees may only carry out work and professional activities other than those carried out at HASENKAMP provided these do not diminish the effectiveness expected in the performance of their duties, do not pose a risk to HASENKAMP's reputation or are in conflict with HASENKAMP's interests. Any other work or professional activity that may affect the working day at HASENKAMP must be previously authorized by the General Director or the Compliance Committee.

Employees should avoid acquiring any participation or collaboration in any activity that:

- a. deprives HASENKAMP of the attention or time required to carry out their duties during working hours properly.
- b. creates an obligation or distraction that may affect their judgment or ability to act in the best interest of the corporation.
- c. conflicts with the economic interests of the corporation.

When an employee intends to take up a second job, he or she must inform his or her line manager who may grant specific written approval.

No employee shall accept an appointment as a member of a board of directors, standing committee or similar body of another company, organization or governmental agency (not to industrial, professional, social, charitable, educational, religious, political or legal organizations) without the prior approval of the General Management.

5.7. USE OF COMPANY ASSETS AND SERVICES

HASENKAMP employees will use the company's assets and services efficiently and will not use them for their own benefit.

Employees must protect HASENKAMP's assets and only use them properly and efficiently.

All employees will attempt to protect company assets from loss, damage, misuse, theft, fraud, embezzlement and destruction. These obligations cover both tangible and intangible assets including know-how, confidential information and IT systems.

In this respect, HASENKAMP employees shall in no way use the equipment made available by HASENKAMP to install or download programmes, applications or content that are illegal to use, that contravene HASENKAMP's rules or that could damage HASENKAMP's reputation. Neither will they make use of HASENKAMP's funds or cards to pay for activities that are not part of their professional activity.

Employees must be aware that the documents and data contained in HASENKAMP's information technology systems and equipment are the property of HASENKAMP and may be subject to review by the competent HASENKAMP units or by third parties designated by HASENKAMP, when deemed necessary and permitted by the regulations in force.

5.8. INFORMATION CONFIDENTIALITY AND PERSONAL DATA PROTECTION

HASENKAMP personnel have an obligation to protect the information and knowledge generated within the organization and owned or held by the organization.

Some of HASENKAMP's records, reports, documents, devices, processes and methods that are not in the public domain are considered by HASENKAMP to be secret and confidential, and disclosure of this information is prohibited without express written permission.

Employees shall refrain from using for their own benefit any data, information or document obtained in the course of their professional activity. Nor will they communicate information to third parties, other than in compliance with applicable regulations, the HASENKAMP standards, or when they are expressly authorized to do so. They will also not use confidential data, information or

documents from a third party without their written permission.

HASENKAMP personnel undertake to maintain the confidentiality and use of any data, information or documents obtained in the course of their duties at HASENKAMP in accordance with relevant internal regulations. In general, unless otherwise indicated, the information to which they have access must be considered confidential and may only be used for the purpose for which it was obtained.

Likewise, they shall not duplicate, reproduce or misuse the information necessary for the performance of their tasks and shall not store it in information systems that are not owned by HASENKAMP, except for expressly authorized cases and purposes.

The obligation of confidentiality shall remain after the termination of the activity at HASENKAMP and shall include the obligation to return any HASENKAMP-related material in the employee's possession at the time of termination of their relationship with HASENKAMP.

HASENKAMP personnel shall respect the personal and family privacy of all persons, whether employees or others, to whose data they have access. Authorisations to use data must respond to specific and justified requests. HASENKAMP's employees must comply strictly with the established internal and external rules to ensure the correct processing of information and data provided to HASENKAMP by third parties.

In the collection of personal data from customers, employees, contractors or any person or entity with whom a contractual or other relationship is maintained, all HASENKAMP personnel shall obtain consent, where required, and undertake to use the data in accordance with the purpose authorized by the grantor of said consent. In addition, HASENKAMP personnel must be aware of and respect all the internal procedures implemented with regard to the storage, custody and access to data that are intended to guarantee the different levels of security required in accordance with their nature.

Employees shall report to the relevant department or area any incidents they detect that relate to the confidentiality of information or the protection of personal data.

5.9. PREVENTION OF MONEY LAUNDERING AND FINANCING OF TERRORISM

HASENKAMP's workers will comply strictly with the rules established in the Money Laundering and Terrorist Financing Prevention Manual.

They shall exercise special diligence in complying with the following rules:

To ensure that they have adequate knowledge of the client, complying with the rules of the Money Laundering and Terrorist Financing Prevention Manual on due diligence and knowledge of the client.

To confirm and document the true identity of the customers with whom they have any type of business relationship, as well as any additional information about the customer, always in accordance with the provisions of the regulations for the prevention of money laundering and terrorist financing that are applicable.

Clients who are prohibited by the Money Laundering and Terrorist Financing Prevention Manual will not be accepted.

5.10. IMPORT AND EXPORT LICENCES AND PERMITS

In all the import and export operations of any type of goods or services, HASENKAMP will always act in accordance with the legislation applicable to the countries concerned.

The recipients of this code of conduct shall be aware of and comply with the applicable legislation for each export and import transaction, providing the competent authorities with the legally required information and obtaining from them all the permits and authorisations that may be required to carry out the international trade transaction.

5.11 MISLEADING ADVERTISING

The aim of HASENKAMP is to contribute to making advertising a particularly useful tool in the economic process by ensuring that advertising ethics and the rights of those the advertising is targeted at are respected, notwithstanding the defence of professional interests.

5.12 PROTECTION OF INTELLECTUAL PROPERTY

HASENKAMP is committed to protecting its own and others' intellectual property.

Intellectual property rights are an invaluable asset, and as such must be protected and respected both internally and externally. In a non-exclusive manner, this category includes copyright, reproduction, trade secrets, rights over knowledge and the transmission or reproduction of the same.

HASENKAMP personnel are committed to:

- a. Use the trademark of any of the companies that comprise HASENKAMP.
- b. Never associate it with content that is of an offensive, defamatory or degrading nature.
- c. The intellectual property resulting from the work of employees during their term in the entity, using HASENKAMP's means and as part of their activity, are the property of HASENKAMP.
- d. Workers may only make use of goods protected by intellectual property rights for which HASENKAMP has transferred the use, pays for the license of use, or are classified as being of public domain.
- e. Workers are prohibited from copying, publishing, reproducing, storing or making available to third parties goods protected by the right to intellectual property of which the entity has not been granted the use, does not pay the license for its use, or is not classified as being of public domain.
- f. Not to contribute or participate in any exchange network of protected files.
- g. Where there is a right to use protected property, care shall be taken to ensure the correct treatment of the same, in a diligent and transparent manner, faithfully mentioning the sources and authors of the same if required.

5.13 OPERATIONS LOG

All financially significant operations carried out by HASENKAMP shall be clearly and accurately recorded in appropriate accounting records that represent a true and fair view of the transactions carried out and shall be made available to members of the Compliance Committee.

HASENKAMP employees shall enter financial information into

HASENKAMP's systems in a complete, clear and accurate manner, so that they reflect their rights and obligations under the regulations applicable on the relevant date.

HASENKAMP undertakes to implement and maintain an adequate system of internal control over the preparation of financial information, ensuring regular monitoring of its effectiveness.

5.14 ETHICS IN FINANCIAL REPORTING

HASENKAMP and its employees are committed to providing full, fair, accurate, timely and comprehensible information in HASENKAMP's public reports.

Records and other documentation must be maintained in accordance with existing legal, regulatory or contractual requirements. HASENKAMP prohibits any employee from altering or destroying records except as authorized by its policy or guidelines.

Financial records should be available for inspection by management and auditors.

HASENKAMP should seek to address and remedy any weaknesses in internal control identified by employees or third parties.

The manipulation of HASENKAMP documentation, including the introduction of fictitious items, the deliberate manipulation of estimates, as well as any other improper business transactions are strictly prohibited.

5.15 PRIVILEGED INFORMATION

Employees shall not use or disclose, for third party use, inside information obtained as a result of their employment with HASENKAMP for their own economic benefit.

The legislation in force provides for financial penalties and imprisonment for the committing of the aforementioned actions. In addition, these actions could be grounds for dismissal for just causes.

These prohibitions apply to all directors, officers and employees at all levels, including senior managers and directors, both internal and external.

6. ALLEGATIONS OF WRONGDOING

All employees have the right and duty to report any breach of this Code and of HASENKAMP's internal regulations by other employees or collaborators. The denunciation must be made by e-mail via the ethical channel: ethical-channel-spain@hasenkamp.com.

The procedure for lodging a denunciation is regulated in the "Compliance Committee and Ethical Channel" Policy. In all cases the complainant must identify himself/herself, make a statement of the facts that are the subject of the denunciation and HASENKAMP will guarantee the confidentiality of the complainant's identity at all times.

7. COMPLIANCE COMMITTEE

In order to ensure compliance with this Code, HASENKAMP has established a Compliance Committee formed by:

- Mr. Enrique López: Sales Director.
- Mrs. Elena Rojo: Director of Operations.

The Compliance Committee may act on its own initiative or at the request of any HASENKAMP employee, supplier or third party with a direct relationship and legitimate commercial or professional interest, by making a denunciation in good faith.

To this end, the communications made under this Code, whether these contain denunciations of non-compliance or queries regarding its interpretation or application, may be sent to the company through the afore-mentioned ethical channel.

The Compliance Committee reports in a hierarchical manner to the Directors and has the following basic functions:

- a. Monitoring compliance with and the internal dissemination of the Code to all HASENKAMP personnel.
- b. Receipt of all types of documents relating to the application of the Code and its submission, where appropriate, to the HASENKAMP department responsible for processing and resolving it.
- c. The control and supervision of the processing of files and their resolution.

- d. Interpretation of queries raised by the application of the Code.
- e. The proposal to the General Director for any clarifications and implementation measures required for the application of the Code.
- f. Supervision of the Ethics Channel and compliance with its procedures.

In the performance of its duties, the Compliance Committee shall ensure the following:

- a. Confidentiality of the identity of complainants, unless the transmission of information is required by Law or a court order.
- b. Investigation of a procedure appropriate to the circumstances of the case in hand, in which the right to be heard and the presumption of innocence of any affected person are always respected.
- c. The indemnity of any complainant as a result of the filing of instances or denunciations in good faith.

The Compliance Committee shall have the necessary means to ensure the implementation of this Code.

8. PUBLICISING OF CODE.

The Code will be made available to all employees and will be the subject of appropriate communication, training and awareness-raising actions for their timely comprehension and implementation in HASENKAMP.

HASENKAMP will carry out the necessary training activities so that all its employees are sufficiently aware of this code of conduct and its contents.

The training shall include criteria and guidelines for resolving doubts based on experience gained.

In addition to general training, HASENKAMP will provide specialised training for those groups of workers who, owing to their duties, must have more precise and detailed knowledge of the rules of conduct applicable to their area of activity.

9. SUPPORT AND ADVICE

All recipients of this code of conduct will have the following channels at their disposal to convey any queries about the code of conduct in their respective fields:

Verification and internal controls: Compliance Committee

HASENKAMP will establish: an adequate monitoring and control system that verifies compliance with the code of conduct without waiting to receive complaints or denunciations.