



COLOMER LEATHER GROUP

1792

## **CODE OF ETHICS**

**COLOMER LEATHER GROUP**

By working at **COLOMER LEATHER GROUP** (hereinafter, "**CLG**"), each employee is representing our entity in the outside world - in front of our customers, suppliers, vendors, partners and the public.

Our standards and principles, including those applicable to the personal conduct of our employees, are exceptionally high. Therefore, our employees are expected to reflect CLG's core values of integrity, respect and responsibility in the development of our professional activity. These global ethical values apply to the way we conduct business and comply with all applicable laws, rules and regulations.

CLG'S directors and managers are committed to fostering a CLG culture that is inclusive, collaborative and constructive. The respect and alignment of our employees towards these qualities is essential.

In order to promote the application of our ethical values in our day-to-day business, we have developed these ethical principles. Thus, these ethical principles constitute a resource for our employees and other third parties when making decisions in the best interest of CLG and consistent with our high standards.

Of course these ethical principles cannot answer all the questions or foresee all the possible situations that may arise in our day-to-day professional activity, so we have established other mechanisms to resort to in case of doubt. If you are unsure of what to do in a particular situation or believe that ethical principles, local policies, laws and/or regulations are being violated, we strongly encourage you to express your concern to the company. A problem cannot be solved unless it is identified. It's simple: if you have a question or concern, speak up.

We believe that the quality of our people and our commitment to integrity in everything we do will not only enable us to maintain high ethical standards, but will also help us continue to thrive, achieving long-term success. We are convinced that, if we work together to defend our core values and qualities, we will not only meet our goals, but also remain proud of how we achieve success.

Sincerely,

The Management

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## OUR VALUES – OUR BEHAVIOUR

### SCOPE

It is the responsibility of all employees to protect CLG's reputation. We have a duty to always act with integrity so that others are certain that they can trust us and our authenticity and impartiality. We want to continue to be recognized as a company that fulfills its commitments, is a reliable partner and an icon of unparalleled excellence. At CLG we are strongly committed to developing our business in compliance with applicable laws, rules and regulations. When we do the right thing, we protect our reputation, which helps us succeed in today's complex and competitive business environment.

These ethical principles are intended to provide us with guidance in case of doubt about what to do or how to act in certain situations. They are a summary of how we will do business, in accordance with our ethical values, laws, rules and other applicable regulations.

CLG's global ethical principles summarized in this Code (the "**Principles**") reflect our core values and qualities. These Principles apply to all employees of CLG entities worldwide. We also expect the third parties with whom we do business including suppliers, contractors, agents, representatives, distributors and consultants to adhere to the spirit of these standards, to comply with the Principles contained herein, and to comply with all of their contractual obligations. At CLG, we seek to do business with third parties who share our commitment to high standards of integrity and responsibility in doing business.

These Principles cannot anticipate every situation that arises in our day-to-day life. In addition, the laws, rules and regulations applicable to these Principles are complex and may change from country to country. For this reason, these Principles should be complemented by global and/or local standards, policies, laws, standards and other applicable regulations. Each CLG company may adopt and implement applicable local guidelines, policies and practices, as well as appropriate training, in accordance with these Principles and applicable local laws, rules and regulations.

The Board of Directors of CLG has adopted a **Crime Prevention Model** in order to prevent the criminal liability of the entities of CLG and to forge a true culture of compliance, causing CLG to be governed by the Principles contained in this Code.

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## RAISE DOUBTS

Determining when conduct is permitted under a particular policy depends on the circumstances of the situation, as well as applicable local laws, rules and regulations. While CLG's ethical values and leadership qualities to which we aspire should provide guidance, should you have any doubts or questions regarding the interpretation and/or application of the Code of Ethics, as well as other internal regulations related to CLG's Crime Prevention Model, it is recommended that you report directly to the Compliance Committee via the email address [canaletic@colomerlg.com](mailto:canaletic@colomerlg.com).

CLG has entrusted a **Compliance Committee** with the supervision of the operation and compliance with current legislation, the Code of Ethics and the internal regulations that develop it, including the Crime Prevention Model Manual.

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## REPORT INCIDENTS

All CLG professionals have the obligation to ensure compliance with this Code of Ethics, the law and other internal regulations, as well as to report through the Ethics Channel or other channels provided for this purpose (described in the Incident Reporting Policy available on the CLG website), any incident of which they are aware, so that the problem is known and solved.

**“Incident”** shall mean any indication, suspicion or reasonable risk of non-compliance with applicable law or CLG's internal regulations, including this Code of

Ethics and other policies and procedures, which may have occurred in the course of its business activities.

Regardless of the form in which it is made, any communication will be welcomed, taken seriously, and examined in order to assess whether the facts in question comply with our ethical and legal standards. In any case, it is essential to provide sufficient information for CLG to investigate the matter properly and to have the possibility to contact the reporting person for possible questions and clarifications.

In the event of reasonable indications or suspicions of non-compliance with applicable law or CLG's internal regulations, CLG professionals have a **duty to report it as soon as possible**. To this end, CLG has put into operation a communication mechanism, the Internal Information System, which encompasses the different internal channels for reporting Incidents, the preferred channel being "**The Ethics Channel**". The Ethics Channel is accessible through CLG's website and through the following link: <https://colomer.whistlelink.com/>. For further information, please refer to the Single Annex to this Code.

All professionals have the obligation to cooperate fully and truthfully with any investigation related to any violation of these Principles and CLG's internal regulations, and in no case must they alter or destroy documents or evidence related to any investigation.

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## OUR NON-RETALIATION POLICY

CLG strictly prohibits its professionals from intimidating other professionals or preventing them from reporting an Incident. In the same way, CLG does not tolerate the adoption of any type of retaliation against the whistleblower who reports an Incident in good faith and in accordance with CLG's internal regulations. Confidentiality will be maintained unless disclosure is required and permitted under applicable law. Claims of retaliation will be promptly and thoroughly investigated

and appropriate action will be taken against anyone who has been involved or participated in any form of retaliation.

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## **RESPONSIBILITY**

Each professional is expected to ensure that his/her actions are in accordance with applicable law, as well as the purpose and spirit of these Principles. In this sense, before carrying out any action, each professional must ensure that it is based on valid commercial reasons, if it is not detrimental to CLG's interests and is free of the slightest appearance of impropriety.

Before taking any action, it is good to assess what the proposed behavior would look like if it were published on the front page of a newspaper. In any action, we expect professionals to act in the following way:

- Ethical, honest, transparent and in accordance with the law.
- Proactively, not passively, to ensure that our Principles are observed;  
and
- In CLG's best interest, above any individual interest.

Violation of the laws, rules and other regulations applicable to these Principles can have severe legal consequences for CLG and the individuals involved, not to mention damage to our reputation. Accordingly, any breach of these Principles will not be tolerated and professionals who violate them will be subject to appropriate disciplinary action.

## 1. WORKPLACE

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### FAIR LABOR PRACTICES

**We are committed to fair labor practices and strive to conduct our business in compliance with applicable labor laws, regulations and standards.**

It is the policy of CLG to foster and maintain an enabling work environment where all individuals are treated with due respect and dignity.

At CLG, we are strongly committed to managing our business in compliance with all applicable laws, rules and labor regulations applicable to each location in which the company operates, including, without limitation, laws, rules and regulations relating to wages and working hours, equal employment opportunities, discrimination, immigration, privacy, collective bargaining, the hiring of minors and forced labor.

At CLG we will not tolerate any form of discrimination, hostile work environment, harassment or bullying.

We also expect third parties with whom we do business to manage their business in compliance with applicable labor laws. This policy applies to all aspects of employment including selection, hiring, transfer, salary, promotions and benefits.

## HEALTH & SAFETY

**We are committed to the health and safety of our employees, customers and other third parties with whom we interact.**

It is CLG's policy to establish, provide and maintain optimal health and safety conditions for our employees, customers and all those within our workspaces, whether offices, industrial spaces, warehouses and distribution facilities, training spaces, exhibition or sales. At CLG we are committed to complying with applicable health and safety laws, standards, regulations and codes. Therefore, all employees responsible for health and safety conditions must take all necessary measures provided for in the relevant laws, standards, regulations and codes.

We also do not tolerate any violence in our workplaces. In addition, any conduct, whether verbal or physical, that poses a threat or intimidation to a co-worker, client or other third party is prohibited.

## 2. RESOURCES & INFORMATION

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### PROTECT CLG RESOURCES

**We are committed to protecting CLG's resources and ensuring that they are used for legitimate company purposes and not for personal gain.**

CLG's resources, whether tangible or intangible, including for example business opportunities, financial resources, equipment, office supplies, promotional material, intellectual property, confidential information and Information Technology systems, including computer and network systems, products (stock), samples and testers, are the property of the company and should be used for legitimate business purposes and to promote CLG's interests. These resources will not be shared with any unauthorized third party and should not be used for personal gain; however, IT systems may be used by CLG employees for limited personal use, subject to local laws and policies.

CLG reserves the **right to control the use of the IT resources** that CLG makes available to professionals, including the communications that have been made, always in accordance with current legislation. Therefore, CLG professionals should have no **expectation of privacy** with respect to the use of such CLG-owned resources.

All CLG employees must care for CLG's resources and must treat all of these assets carefully, preventing their loss, theft, damage or misuse. Any suspicion or confirmation of theft, damage or misuse of CLG resources must be reported immediately to the hierarchical superior or whoever is indicated locally.

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## CONFIDENTIAL INFORMATION

**We protect CLG's confidential information and only use it with appropriate authorization and exclusively for the best interests of CLG.**

CLG information is one of our main assets. Due to the very nature of our business and the high level of competition in the industry, much of this information is strictly confidential.

It is common for our professionals to have access to confidential CLG information during the course of their work. All confidential information must be protected and not disclosed to any other person, except in the course of their work at CLG, with proper authorization and for the sole purpose of promoting the best interests of CLG.

**"Confidential Information"** includes confidential, proprietary and/or proprietary information of CLG, including without limitation:

- Trade secrets;
- New product ideas and launches;
- Strategies, programs and business plans;
- Marketing, R&D, Promotions, Manufacturing, Distribution, and Retail Data & Insights;
- Financial, sales, pricing, projections, earnings, and related information;
- Current, past, and future customer information, as well as vendor and staff lists;
- Confidential contracts with third parties;
- Information relating to the organization and its corporate structure;
- Computer passwords and program design;
- CLG's proprietary software design and hardware configuration;
- Technology information owned by CLG;

- Private or personal information relating to CLG, its owners, and professionals or customers;
- Personally identifiable information about professionals, clients, or any third party; and
- Any other information expressly designated as "Highly Confidential," "Confidential," or "Internal."

Any loss, theft or unauthorized access, use, disclosure or acquisition of confidential information must be reported immediately to your supervisor or to whomever is indicated locally.

Upon termination of employment for any reason, or at the request of CLG, the employee is obligated to return to CLG all documents, papers, notes, books, records, materials and data containing Confidential Information, as well as any existing copies. The obligations set out in this policy shall remain in force after the termination of the employment relationship for any reason.

At CLG we also respect the rights of third parties with respect to your confidential information and intellectual property. Thus, information will only be obtained from competitors by legal and ethical means. In addition, in the development of our business, our employees may have access to non-public information about publicly traded companies. In this regard, our employees may not use such "inside information" about publicly traded companies for their personal benefit, to share with others, or to spread false rumors.

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## **PRIVACY AND INFORMATION SECURITY**

**We collect, use and handle personal data and information solely for valid business reasons and in accordance with applicable laws, rules and regulations, protecting it from unauthorized access, disclosure, acquisition and use.**

Most countries in which we do business have laws governing the collection and use of personal data and information. These laws are intended to protect the

privacy of the individuals with whom we deal, whether they are employees, customers, suppliers, or any third party.

It is CLG's policy to obtain, use and process personal data and information only for valid business reasons and in accordance with applicable laws, rules and regulations. Employees handling personal data and information must ensure that such information, regardless of form, is obtained, processed, used, stored, transferred (internally and externally), protected and reliably disposed of in accordance with good practices, CLG policies and applicable law.

At CLG we are committed to adopting technical, administrative or physical security measures to safeguard personal data and information and to control the risks of unauthorized access, use, modification or disclosure. In the event that personal data and information are made available to authorized third parties for legitimate business reasons, whether contractual or otherwise, must be warned about the security and privacy of such information.

Any breach of security or suspicious activities related to personal data and information, including any loss, theft or unauthorized access, disclosure, acquisition or use of such data and information must be immediately reported to your line manager.

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## **PRECISE ACCOUNTING BOOKS AND RECORDS**

### **We maintain accurate accounting books and records.**

CLG's books and records must be accurate, complete, understandable, justifiable and comply with general accounting principles. The company's records should reflect the true nature of each transaction or operation that is recorded.

The company's books and records include, but are not limited to, financial documents, accounting and inventory books, expense reports, contracts, invoices and purchase orders.

The integrity of our financial statements and supporting documentation is essential to the successful development of our business, as well as to maintaining the confidentiality and trust of our customers, partners and third parties.

We always expect strict adherence to accounting methods and other controls and cooperation with CLG's internal and external auditors.

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## **UNAUTHORIZED SALE AND DISTRIBUTION OF OUR PRODUCTS**

**We prohibit the unauthorized sale and distribution of our products to protect our brand.**

At CLG we have made a significant investment in our commercial network to preserve the image of our brand. Therefore, the sale of CLG products is limited to authorized outlets and end consumers, so any diversion of CLG products to unauthorized sellers is prohibited, to the extent permitted by applicable local law.

To this end, our professionals are expected to abide by internal rules designed to restrict the sale of products outside of our authorized networks and help us enforce this policy.

Consequently, if a professional becomes aware of any of the following assumptions, he or she is obliged to report it immediately to his or her manager:

- Excessive orders and/or sales of CLG products, either to authorized outlets or to end consumers;
- Sales by unauthorized sellers of what appear to be new, genuine CLG products; or
- Shortages of products, hidden products, or boxes that have been tampered with, as well as any knowledge or suspicion of theft.

### 3. WE RUN OUR BUSINESS ETHICALLY AND LEGALLY

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#### ANTI-CORRUPTION

**We are committed to the highest ethical standards and will not tolerate corruption.**

CLG's core values of integrity, respect and responsibility in the performance of our professional activity include compliance with all anti-corruption legislation. In short, we compete in innovation, quality and exemplary service and do not resort to inappropriate means to influence "business buying".

In general, anti-corruption laws prohibit offering, making or receiving bribes. A "**Bribe**" is anything of value offered in an attempt to obtain and/or retain a business, secure an improper advantage, or influence a business decision, including, but not limited to, streamlining or facilitating routine administrative procedures. "**anything of value**" in terms of bribery means anything of monetary value, including cash and cash equivalents, as well as gifts, meals and entertainment, job offers for family members, free or discounted products, donations, travel expenses, etc. Some anti-corruption laws focus on unduly influencing public officials, while other anti-corruption legislation extends to the private sector.

In certain circumstances, CLG may be liable for inappropriate conduct by a third party. For this reason, at CLG we are committed to doing business only with third parties who share our same standards of intolerance to corruption. Thus, before contracting any service with any service provider and other third parties, an appropriate due diligence must be carried out. In addition, as a general rule, all business relationships must be documented by means of an appropriate written contract.

Our employees must also comply with locally established policies and procedures regarding the approval and registration of gifts, meals, travel and entertainment, as well as other expenses.

Our employees must ensure that all business-related transactions are properly recorded in CLG's books and records and, in any case, must comply with internal controls to ensure compliance with these Principles.

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## **SUPPLIERS & BUSINESS PARTNERS**

**We carefully select our suppliers and business partners, maintaining business relationships with those who share our commitment to the highest ethical standards.**

Our Suppliers and business partners are vital to our ability to do business and meet our customers' expectations. At CLG we expect our suppliers and partners to comply with applicable laws, rules and regulations, as well as with the relevant Principles previously established. Therefore, we choose them carefully and strive to use a transparent selection process based on objective criteria.

CLG's reputation for integrity in negotiations with suppliers and third parties requires the highest standards of conduct. Relationships with suppliers and business partners are a critical component of certain employee responsibilities. These employees represent CLG's integrity and ethical standards to our supplier portfolio. In order to maintain the integrity of CLG, it is important that ethical limits are established in these relationships. It is strictly forbidden to engage in conduct that personally benefits an employee or endangers the integrity of CLG.

In any case, our employees must strive at all times to treat our suppliers, distributors, competitors and the public fairly in accordance with ethical business practices.

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## **CONFLICT OF INTEREST**

**We require our professionals to avoid any real and/or apparent conflict of interest.**

In compliance with CLG's expectation that our employees meet the highest standards of integrity, all employees must avoid those activities, interests and

relationships that conflict with CLG's interests or otherwise may affect their ability to perform their duties objectively. Employees should be aware of and avoid real conflicts of interest, as well as circumstances that appear to give rise to a conflict of interest. Business decisions should always be made in the best interests of CLG.

No transaction with an outside business entity that supplies goods or services to CLG should be influenced by an employee's personal interest or relationship. Our employees must not have direct or indirect interests, or relations with a third party that may affect the objectivity and independence of criteria or action of the employee in the fulfillment of their responsibilities and duties with CLG or cause harm to CLG because its effects may cause misunderstandings to other third parties.

Our employees must report to their line managers any current or potential business relationships, including those involving family members, that may result in a conflict of interest.

Any business opportunity belonging to CLG, arising out of or related to any liability or duty of an employee belonging to CLG and/or discovered or advised through the use of CLG property, assets or information, may only be used in the best interests of CLG and may not be used directly or indirectly for any other purpose, including for personal gain.

To the extent permitted by applicable law, our employees must have prior written permission from CLG before accepting a managerial position from a company that is not a CLG entity. This approval will only be approved in the event that the management position does not present any conflict with the interests of CLG.

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## **GIFTS & ENTERTAINMENT**

**We comply with legal standards and CLG guidelines regarding the acceptance and delivery of gifts and other forms of entertainment.**

All professionals must comply with applicable legal standards and CLG guidelines in relation to the acceptance and delivery of gifts and entertainment, travel

expenses, meals, and the like, when dealing with all suppliers, vendors, customers, and any third parties with whom we do or may do business.

Our professionals should never expect or encourage the receipt of gifts or entertainment from any third party that has or may have a business relationship with CLG.

Gifts and entertainment may only be accepted or made from/to a third party with whom CLG conducts or may conduct business if:

- Do not violate any applicable laws, rules or regulations (such as some anti-corruption legislation) or generally accepted ethical standards;
- Are consistent with acceptable business practices;
- They are sufficiently limited in value and in a form that is not considered to seek to influence a business decision or to influence a particular course of action;
- They do not create the appearance of irregularity;
- It's not money or items that can easily be turned into money;
- Its publication would not be detrimental to CLG;
- They do not violate the rules of the third party who makes or receives it; and
- They comply with local laws, rules and regulations regarding the proper recording of them in the company's books.

All of our professionals are expected to familiarize themselves with applicable local laws and guidelines in this regard.

## **ANTI-MONEY LAUNDERING**

**We are committed to ensuring compliance with applicable anti-money laundering laws, rules and regulations.**

Money laundering involves committing a crime in order to conceal the illegal origin of the funds. At CLG we comply with all laws, regulations and other regulations applicable to the fight against money laundering. To this end, all of our employees are expected to conduct business only with accredited entities and individuals engaged in legitimate business activities, whose funds come from legal sources.

Our employees must be cautious and supervise, among other aspects, the way in which payments are made by and for the natural and legal persons with whom we do business in order to prevent and detect any irregularity and/or suspicious conduct, and/or forms of payment; as well as comply with laws, rules and other applicable regulations in this regard.

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## **COMPLIANCE WITH IMPORT AND EXPORT LAWS**

**We comply with all laws that regulate international trade.**

We must comply with all applicable laws, standards and other regulations governing the import and export of goods, services, software and technology in the various countries in which we do business.

Before importing any product, service or technology, we must verify whether it is subject to any prohibition or restriction. In addition, we must ensure that we retain accurate records of transaction-specific information, including, but not limited to, customs duties.

In cases of exports, we must always verify that the recipient is eligible to receive the item in question. We must also ensure that we analyze our business

partners and confirm that they are not on the lists of designated persons published by different governments and organizations for whom restrictions are placed on trade.

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## UNFAIR COMPETITION

### **We manage and maintain business relationships in accordance with unfair competition laws.**

Most countries have laws regulating unfair competition (also known as antitrust laws), which seek to promote fair competition and prohibit business practices that restrict free competition. In general, these laws prohibit agreements between competitors (horizontal agreements) and agreements between market chain actors (vertical agreements) to control prices and the market, as well as other unfair practices.

It is CLG's policy to comply with all laws, rules and regulations applicable to unfair competition and antitrust, therefore, all of our employees are responsible for complying with these laws, rules and regulations and must refrain from taking any action that does not comply with them.

Among other restrictions, our employees must not participate in any discussion, understanding or agreement with competitors regarding prices, pricing policies, discounts, promotions or other terms and conditions of sale; sales targets, profits, profit margins or cost information; customers; offers; account selection or geographic markets; rejection or termination of sales or supplier accounts, or any other competitive matter. There are other restrictions on how we communicate and do business with our customers.

## SINGLE ANNEX

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### 1. CLG's Crime Prevention Model

The Board of Directors of COLOMER LEATHER GROUP, S.L. has adopted a Crime Prevention Model that complies with the requirements of the Criminal Code in order to prevent the criminal liability of the entities of CLG.

The main purpose pursued through the implementation of an effective Crime Prevention Model is to forge a true culture of compliance, causing CLG to be governed by the Principles contained in this Code, good practices and corporate ethics, rejecting any kind of unlawful conduct.

### 2. Monitoring compliance with the Code

CLG has entrusted a Compliance Committee with the supervision and operation of the Crime Prevention Model and compliance with this Code.

The responsibilities of the Compliance Committee in relation to this Code are:

- Promote and coordinate the application of the Code among all those that are applicable to them, disseminating the contents of the Code, designing and providing the necessary training for its compliance.
- Reinforce and encourage the adoption of the internal policies and procedures necessary to ensure the proper application of the principles contained in this Code.
- Receive and process queries relating to the Code or any other internal regulations.
- Manage CLG's Internal Information System, including the Ethics Channel, as a means through which to communicate Incidents related to the Code.
- Investigate infractions of the Code in the terms regulated in the regulations of the Internal Information System.

The **Compliance Committee** is a collegial body of an internal and permanent nature with autonomous powers of initiative and control. Within the scope of its functions, the Compliance Committee has supervisory authority over all CLG professionals.

### 3. The Ethics Channel

#### ➤ What is the purpose of the Ethics Channel?

As part of the culture of transparency and commitment to the highest standards of business ethics, integrity, and compliance, CLG makes available to all its professionals and the third parties with whom it interacts, among other means of communication, the Ethics Channel, secure, confidential and available 24 hours a day, which allows communication, including anonymously, of any indication or suspicion of non-compliance with this Code of Ethics, other internal regulations or the law.

The Ethics Channel has the appropriate technical and organisational security measures in place to prevent the risk of disclosure, unavailability and loss or destruction of information.

If you have any indications or suspicions about **non-compliance** with this Code, other internal regulations or the law, as a CLG collaborator, **you have the duty to report it** through the Ethics Channel or through the alternative internal channels enabled for this purpose, in accordance with the Incident Reporting Policy.

#### ➤ How do I access the Ethics Channel?

The Ethics Channel is accessible through the link <https://colomer.whistlelink.com>, and through the website of Colomer Leather Group (<https://www.colomerlg.com/es/>).

#### ➤ What happens after the report is submitted?

The Compliance Committee, as responsible for the management of the Internal Information System and the Ethics Channel, will act under the principles of independence and autonomy in the exercise of the functions entrusted to it.

In turn, the Compliance Committee has delegated to Mr. Joan Vilarrasa Folgarolas (the Committee Delegate) the powers of management of the Internal Information System and the Ethics Channel, as well as the processing of investigation files. Any communication sent through the Ethics Channel will be received and managed by the Committee Delegate, unless the communication is submitted indicating that the Incident affects the Committee or someone under his or her direct supervision. In this case, the communication will be handled by the other member of the Compliance Committee.

The Compliance Committee may designate a third party to conduct the internal investigation, which shall at all times be governed by the principles of integrity and impartiality and shall scrupulously respect the confidentiality and privacy of the persons involved in any communication or investigation procedure.

➤ **Principles of the Internal Information System, including the Ethics Channel**

In order to provide the greatest security and protection to the whistleblower, and, in general, to any person affected by a communication, CLG is committed to:

- Respect the confidentiality of communications.
- Do not reveal the identity of the reporting person, without his authorization, unless legally imposed.
- Allow and protect the anonymity of whistleblowers who report an Incident without identifying themselves.
- Prevent, investigate, and act against any retaliation, threat, or attempted retaliation against a whistleblower, and investigate and take action if any.
- To give a hearing to the persons concerned and to respect the right to presumption of innocence and the right to honor.
- Comply with current legislation on whistleblower protection and data protection.

### **REMEMBER THAT:**

- All bona fide communications will be welcomed and dealt with with the utmost promptness and confidentiality.
- Any failure to report an Incident will be considered, in itself, a breach of the Code and the regulations of CLG's Internal Information System.
- The manifestly reckless or outright bad faith use of the Ethics Channel or any other internal communication channels may give rise to disciplinary action and, where appropriate, legal action by CLG.
- In the event of an internal investigation, if the Compliance Committee requests your cooperation, you have a duty to actively cooperate by providing any additional documentation or information required without delay.

**For more information** - You can consult the Incident Reporting Policy and the Incident Management and Internal Investigations Procedure, accessible on the CLG website.

#### **4. Using CLG's IT Resources**

The IT resources that CLG makes available to employees, including corporate e-mail accounts, computers, laptops, tablets, telephones, Internet access and other CLG communication systems made available to employees are the property of CLG and, therefore, only limited personal use may be made of them.

In any case, CLG reserves the right to control and monitor their use, including the communications that have been made, always in accordance with current legislation. Therefore, CLG professionals should have no expectation of privacy with respect to the use of such CLG-owned resources.

In the event of an illegal use of the resources and tools made available to professionals, CLG reserves the right to bring it to the attention of the authorities.

## **5. Communication & Training**

In order to guarantee access to the content of this Code by professionals, CLG will provide a copy of it at the time of entering into the employment or commercial relationship with them.

Likewise, the Compliance Committee will promote the dissemination of the contents of the Code of Ethics among CLG's professionals. To this end, the Compliance Committee will develop an internal communication and training plan.

It is the inexcusable obligation of all professionals to attend the corresponding periodic training on this Code and, where appropriate, the regulations that develop it.

## **6. Failure to comply with the Code and Disciplinary Regime**

Failure to comply with this Code or the regulations implementing it by any employee will constitute an infraction and will be sanctioned, which may include the termination of the employment or commercial relationship.

In the same way, failure to comply with the provisions of this Code may entail a civil or criminal offence, deriving the corresponding liability in the civil and criminal spheres to the employee who infringes the provisions of the Code and, where appropriate, to the group itself.