



CODE OF CONDUCT

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1. Purpose

The Code of Conduct of Eurofinsa¹ aims to synthesise the behavioural patterns that should guide the daily work of all employees, whatever their responsibility, their position in the organisation, type of employment relationship or location.

Thus, the Code of Conduct of Eurofinsa establishes the behaviour expected of employees in those ethical issues related to the commitments of the organisation or with the most relevant applicable laws and regulations in view of Eurofinsa's activities and characteristics.

The Code emphasises the principle of due diligence applied by the organisation in the fields of ethics and integrity for the prevention, detection and eradication of misconduct, regardless of the nature thereof. The Code reflects the principles of Eurofinsa on issues related to ethics and integrity but does not modify or supersede any rules or policies established by the organisation.

The Code also includes the expected behaviours of employees of the organisation in those matters contained in the Spanish Penal Code, following the reform enacted on December 23, 2010, which the management of the organisation considers more relevant given the characteristics and business in which Eurofinsa operates.

¹ This excludes IBT Group LLC or any of its subsidiaries which have their own code of conduct.

2. Principle of due diligence

For Eurofinsa, due diligence on ethics and integrity refers to the activities the organisation undertakes to prevent, detect and, where appropriate, eliminate misconduct and acts contrary to the applicable internal and external rules as may appear in the organisation.

Eurofinsa understands that due diligence on ethics and integrity encompasses various elements.

Emphasis on risk areas

The Code of Conduct provides guidance on those matters relating to ethics and integrity with the greatest relevance, given the characteristics of the organisation and business in which it operates.

Assign responsibilities

The governing body of Eurofinsa is ultimately responsible for overseeing the effective implementation of the Code. Management responsibilities related to knowledge, understanding and enforcement of this Code are delegated to the Response Committee.

Establish commitments

The Code of Conduct summarises the ethical and integrity commitments of Eurofinsa and all employees.

Ensure that people know and understand the commitments

Eurofinsa shall assign the resources needed to ensure that this Code and the underlying standards are known and understood by all employees.

Supervise and monitor

The Response Committee has responsibility for ensuring the knowledge, understanding and compliance with the Code of Conduct and overseeing the proper functioning of the safeguard mechanisms established for this purpose. Its functions also include the monitoring of compliance with the Code in the organisation and periodic reporting to the governing body of Eurofinsa.

Safeguarding compliance

Eurofinsa has established a procedure for notification and consultation by employees of the organisation, overseen by the Response Committee, allowing them to report, in good faith and safe from retaliation, any improper practices in the areas covered by the Code. All employees of the organisation are required to report any misconduct that they observe. The Response Committee is responsible for processing the notifications and inquiries received and to ensure, in general, compliance with the Code within the organisation.

Correcting malpractices

Eurofinsa applies the principle of zero tolerance for bad practices in the issues reflected in the Code. Violations will be analysed and resolved by the Response Committee according to the applicable internal and external regulations and in conformity with the procedure for the resolution of claims and inquiries in criminal and other matters.

Improve

Eurofinsa is committed to developing, if necessary, internal regulations, processes and controls for the effective implementation of the commitments contained in this Code of Conduct.

3. Scope of application

This Code of Conduct is applicable to all employees of Eurofinsa, regardless of their position, type of employment contract or location.

Eurofinsa will also promote and encourage its suppliers, collaborating companies and other business partners to adopt behavioural patterns consistent with those defined in this Code of Conduct.

The standards of conduct contained in this Code are not intended to describe every situation or circumstance that Eurofinsa employees can find themselves in, but rather to establish some general rules of conduct to guide them in discharging their responsibilities.

4. Principles of Conduct

All employees (hereinafter referred to as the "people ") of Eurofinsa must undertake their professional duties in accordance with the principles of conduct which are summarised below.

4.1 Regulatory compliance and respect for ethical values

The people of Eurofinsa must strictly comply with the internal rules and laws that are applicable to the organisation and its activity. This commitment forms the basis of ethical behaviour expected of everyone in the organisation.

Eurofinsa's activities should be performed with strict respect for human rights and civil liberties, according to applicable laws and internationally accepted practices. Among the standards that the organisation draws on are the International Bill of Human Rights and the ILO core conventions on labour practices

Eurofinsa enforces compliance with the provisions contained in the core conventions of the International Labour Organisation and does not allow, under any circumstances, practices contrary to principles relating to freedom of association, collective bargaining and the elimination of child and forced labour. Similarly, Eurofinsa will not tolerate practices contrary to these fundamental principles among its suppliers, contractors or, in general, any business partners.

The people of Eurofinsa must, in all circumstances, behave ethically and avoid activities that could harm the material interests or social status of Eurofinsa. Similarly, no one in Eurofinsa shall collaborate with third parties in activities that would violate the law or damage the trust of others in the organisation.

All employees of Eurofinsa must know and understand the laws and regulations applicable to their work and request, when in doubt, any advice they may need for those areas of the organisation specialised in different subjects.

Eurofinsa undertakes provide the organisation's people with knowledge and understanding of the internal rules and laws which are most relevant to their area of responsibility.

4.2 Internal control and fraud prevention

Fraud is any intentional and deliberate action, performed by an employee or a third party to make a profit for himself or for the organisation, directly or indirectly, using for said purpose, and in an inappropriate manner, any information, assets or resources of the organisation.

Use and protection of assets

The people of Eurofinsa have the resources they need to perform their professional obligations. The assets of Eurofinsa made available to employees include, but are not limited to, equipment, materials and information.

Any misappropriation or improper use of Eurofinsa's assets constitutes fraud.

The people of Eurofinsa must protect and make good use of the resources and assets that Eurofinsa offers and use them in a responsible manner to prevent damage, loss, theft or misuse. Eurofinsa resources should be used, unless otherwise determined by the organisation, exclusively for the performance of the functions assigned to the people of the organisation.

However, Eurofinsa occasionally allows the use of company assets for personal use as long as such use is sporadic, it corresponds to everyday assets, such as telephones and personal computers, the cost to the

company is marginal and said use does not adversely affect employee productivity. In any case, the people of Eurofinsa will consult with their superiors in case of doubt and never use the assets of the company to develop socially unacceptable activities or any inappropriate behaviour.

The people of Eurofinsa must also strictly comply with the provisions of the internal and external regulations regarding the protection of intellectual property. This includes patent rights, trademarks and copyrights, domain names, (including software copyrights), design rights, data mining or database rights and rights to specialised technical knowledge.

Eurofinsa employees shall at all times access and use information technologies in an ethical, legal and professional manner. Under no circumstances shall the employees use such means to access or distribute material that intimidates, harasses, or threatens other people or companies, or is sexually explicit or otherwise offensive or inappropriate, or transmit any false, derogatory or malicious communication or which may be offensive to the recipient. Eurofinsa employees will refrain from using the funds or credit cards of the organisation for unauthorised personal expenses not related to the activities of the employing company, or for any improper practices or socially unacceptable behaviour related to the above matters or any other.

All documents, data and correspondence contained in information systems that Eurofinsa offers its employees may be subject to revision. By accepting this Code of Conduct, employees of the company recognise the company's right to monitor, supervise, inspect and control electronic communications and computer equipment that the company makes available to the employees thereof.

The people of Eurofinsa must also comply with current legislation on data protection, including personal information.

Eurofinsa undertakes, in turn, to provide employees with information, knowledge and resources needed to comply with the internal and external regulations applicable to information management and data protection.

Lastly, the good name of Eurofinsa is a hallmark of the company. The behaviour of the people of the organisation should seek to preserve and protect this asset.

Confidentiality of the information

Generally, and unless otherwise indicated, the information, in the most ample sense possible, to which the people of Eurofinsa have access in the performance of their professional duties should be considered confidential and should be used exclusively for the development of the functions assigned.

Eurofinsa employees agree to maintain confidentiality and discretion in the use of such information to which they have access in the performance of their official duties, and always in accordance with applicable legislation. Thus, information classified as confidential will only be shared with others in the company that require the information for the performance of their work. No information should be disclosed to any others unless it is made public. No duplicate or reproduction of the information will be made unless necessary for the performance of their tasks. Similarly, in no event shall any employee use or access information to which they are not authorised by the company or disclose such information to third parties.

The obligation to maintain the confidentiality of the information of Eurofinsa shall persist even after the professional relationship with the organisation had ended and shall include the obligation to return any materials associated with the company in the possession of the employee at the time of the termination of the relationship with the company.

Control of financial and accounting information

The falsification, manipulation or deliberate use of false information constitutes fraud. In line with the recommendations of the National Securities Market Commission on internal control over financial reporting in listed companies, Eurofinsa assumes the behavioural principle of transparency and reliability of financial and accounting reporting, as well as full compliance with applicable legislation.

Employees shall transmit such information in a truthful, complete and understandable manner. In no event will any employee knowingly provide incorrect, inaccurate or imprecise information that can mislead the recipient.

Eurofinsa employees shall clearly and accurately reflect the transactions, facts and events in the records of the organisation and shall take special care regarding the reliability of financial and accounting systems introduced in the organisation and subsidiaries, reflecting, the relevant date, the rights and obligations through the relevant assets and liabilities, all in accordance with applicable legislation. The records shall reflect all the transactions, facts and events of the organisation.

Similarly, the governing body of Eurofinsa and all the people in the organisation are committed to ensuring the regular monitoring of the effectiveness of internal control systems on the preparation of financial and accounting information.

If any employee observes any circumstance, which, according to his or her best knowledge and belief, represents a breach of the preceding principles of internal control of financial information, they should make it known to the Response Committee.

Eurofinsa undertakes to provide its employees with the training needed to know, understand and comply with the commitments established by the organisation's internal control over financial information. In any case, only authorised spokespersons of the organisation will be able to publicly comment on the activities or results of Eurofinsa.

Corruption, bribery and relations with third parties

The people of Eurofinsa shall reject corruption in all its forms and act in alignment with national and international standards, including the Spanish Penal Code, the U.S. Foreign Corrupt Practices Act and OECD guidelines for multinational enterprises.

Under no circumstances shall Eurofinsa personnel resort to unethical practices to influence the will of others in order to turn a profit for Eurofinsa or for themselves. Similarly, Eurofinsa personnel must remain vigilant to prevent others from making use of these practices in relation to Eurofinsa.

Eurofinsa expressly prohibits payments, improper gifts or entertainment for any person or entity, public or private, with intent to obtain or retain business or other benefits or advantages. Eurofinsa employees shall not offer or receive, directly or indirectly, in any case, benefits, gifts or cash. Similarly, employees will not offer or receive, directly or indirectly, hospitality or gifts which due to their value, characteristics or circumstances, can reasonably alter the development of trade, administrative or professional relations in which they participate. In this regard, Eurofinsa employees shall exercise professional judgement and common sense to determine the boundary between acceptable and unacceptable gifts based on socially acceptable uses in the different environments in which Eurofinsa operates. In case of doubt the employee should always consult with his or her immediate superior or use the channels established by the company for the purposes of compliance with the Code of Conduct.

Thus, the gifts and hospitality should be received or delivered solely by reason of legitimate interests in compliance with applicable internal and external standards, and be enjoyed jointly by the recipient and the giver. Similarly, the gifts and hospitality received or presented should be sporadic, to avoid regularity which could lead an independent third party to doubt the good faith. Additionally, gifts and hospitality should be

socially acceptable, so that, if publicly known, the receiver and/or giver do feel discomfort. To determine whether the value of a gift or hospitality is acceptable in terms, Eurofinsa personnel will apply the criterion of reciprocity. Gifts either given or received are acceptable provided the recipient can reciprocate.

In any case, the maximum value of gifts from third parties to Eurofinsa personnel is 300 euros. In the case of a meal, the maximum price per person shall not exceed 150 euros.

Hospitality and gifts can be freely accepted by Eurofinsa employees up to value of 150 euros. Between 150 and 300 euros, will require prior authorisation. Gifts and hospitality valued over €300 is strictly prohibited.

The people of Eurofinsa must ensure that not only that the gifts and hospitality provided to third parties are reasonable, transparent and legitimate, but also that they are properly registered by the company.

Employees shall also refrain from facilitating payments or streamlining procedures through the delivery of money or other valuables, whatever the amount, in exchange for securing or expediting the performance of a procedure or action against any judicial body, public administration or government agency. Expenses related to administrative procedures are not considered facilitation payments.

Irregular transactions

The people of Eurofinsa must remain alert to cases where there may be evidence of lack of integrity of persons or entities that are professionally related to Eurofinsa.

In particular, Eurofinsa employees shall avoid, in general, cash payments that are unusual, those made by bearer cheques or those made in currencies other than previously agreed. They should also avoid payments made to or by third parties not mentioned in the applicable contracts, as well as those held in accounts that are not usual in dealing with a particular entity, organisation or person with special attention to and review of those payments not specified in agreements or contracts.

Also, in general, no employee shall make any payments to individuals, companies, entities or accounts opened in countries or places classified as tax havens by the applicable Spanish legislation, or to entities in which it is not possible to identify the partner, owner or ultimate beneficiary.

The people working in Eurofinsa shall make every effort to prevent money laundering. Employees shall also apply the principle of due diligence to avoid collaborating with third parties that could serve as cover for terrorist or criminal activity.

4.3 Market ethics

Conflicts of interest and loyalty to the organisation

Eurofinsa employees shall conduct themselves with loyalty to the organisation.

Conflicts of interest arise when the interests of employees are not aligned with those of Eurofinsa, interfere with their duties or they are motivated to act for reasons other than the performance of the assigned responsibilities.

The relationship between Eurofinsa and its employees should be based on loyalty born of common interests. In this sense, the organisation respects its employees' participation in social, financial or business activities, provided that the domestic law does not provide otherwise, that such activities are legal and not in competition or give rise to potential conflicts of interest with their responsibilities in Eurofinsa or the interests of the organisation. In any case, the people must inform the company in advance, through established channels, of their intention to develop activities in addition to their responsibilities in Eurofinsa and shall not benefit for personal gain from any opportunities that they have learned of in their capacity as employees of the organisation.

The people of Eurofinsa shall avoid situations that could involve a conflict between personal interests and those of the organisation. They should also refrain from representing, intervening or influencing any decision in which they, directly or indirectly, through a related party, have a personal interest.

No employee may serve as a consultant, director, officer, employee or advisor to a competitor of the organisation, except for the services which could be provided at the request of Eurofinsa or with the permission thereof.

Eurofinsa's policy on conflicts of interest also extends to the families of the people in the company. Everyone in Eurofinsa is required to inform the organisation of circumstances that could reasonably lead to a conflict of interest with the informant or the family thereof.

Similarly, the people of Eurofinsa may not participate in outside activities of any nature which could have a negative impact on job performance or image, public perception and reputation of the organisation.

Respect for free competition and market conduct

The people of Eurofinsa will meet the standards set by the market for free competition and prevent joint action or collusion with competitors.

Eurofinsa will fairly compete in the market, engaging the people of Eurofinsa to always conduct business in an honourable manner and never take part in activities involving unfair competition, including misleading or malicious information about competitors. Also, employees shall avoid any form of deceptive or fraudulent conduct used to obtain improper advantages for customers, suppliers or competitors. In particular, employees shall take the utmost care to ensure that the conditions of the contracts and the proper functioning of the procedures to prevent inappropriate treatment of customers or the breach of contract conditions.

In developing their business activities, the people of Eurofinsa will promote the products and services of the organisation based on objective standards, without discrediting or in any way distorting the competition or the conditions or characteristics of their products or services.

Employees shall also ensure that the funding applied for or received from the government receive proper use and application with complete transparency to avoid distorting the conditions for obtaining such funds or enabling any improper use.

The search for market information about companies or sector by Eurofinsa employees will be always undertaken ethically and according to the rules protecting such information. The people of Eurofinsa shall reject data on competitors obtained improperly or in violation of the confidentiality maintained by the rightful owners. In particular, special care will be taken not to violate commercial secrets in cases of the recruitment of professionals from other industry organisations.

Exports and international trade

Eurofinsa conducts its business with people and companies in different countries.

In the U.S., and in countries which impose requirements and restrictions on international trade, the people of Eurofinsa scrupulously comply with the rules in force and shall furnish accurate information on their activities to government authorities upon request thereby. Eurofinsa employees shall also prevent the import or export of certain goods, services or technologies, depending on the nature of the items in question, the parties involved, the final destination or final use and depending on what the authorities determine thereon. In particular, Eurofinsa employees shall strictly comply with the provisions of Spanish legislation on international trade of defence material and dual-use.

Eurofinsa shall also avoid trade relations with countries penalised by the governments of some countries such as the Office of Foreign Assets Control (OFAC) of the US Department of the Treasury. Thus, Eurofinsa at all times considers the Specially Designated Nationals List in their international transactions.

For imports and exports that so require, Eurofinsa shall wait for approval by the relevant government authorities.

All employees of the organisation that work in this area should be aware that their decisions should be verifiable, in the sense that they must be able to show that they followed the rules and procedures established for review of processes by a third party.

Eurofinsa shall become familiar with the companies and people with which it does business. Eurofinsa shall apply reasonable care in selecting new customers and business partners, to ensure compliance with the laws governing international trade in goods and services.

Political neutrality

Eurofinsa undertakes its business without interfering with or participating in political processes of the countries and communities where it operates.

Any relationship of the people of Eurofinsa with governments, authorities, institutions and political parties will be based on the principles of legality and political neutrality. In no case can any donations to be made to political parties or their representatives, except where expressly provided for in the applicable law.

Eurofinsa recognises the right of employees to exercise their freedom of expression, political thought and, in general, participate in public life, provided it takes place outside working hours, off of company premises and does not interfere with the performance of their activity in the company, and is performed in such a way said participation will not lead an outside observer to associate Eurofinsa with any political choice.

Relations with suppliers

Eurofinsa people involved in the selection of suppliers, contractors or external collaborators have an obligation to act impartially and objectively in applying the selection criteria adopted by the organisation. Similarly, they must take reasonable steps and exercise due diligence to avoid acquiring material from dubious sources and exercise proper control to avoid illegal employment of workers in the organisation's supply chain.

No employee of Eurofinsa may offer, give, solicit or accept, directly or indirectly, gifts or favours or compensation in cash or in kind, whatever the nature, to influence the decision-taking process related to the performance of the assigned functions.

In particular, no employee may, without authorization, offer, give, solicit or accept gifts or favours to or from a person or entity with which Eurofinsa maintains relations of any kind which either singly or together with others over a period of one year exceed the value 150 euros. In any case, cash gifts and entertainment are strictly prohibited.

The people of Eurofinsa shall respect the image and reputation of the organisation by contractors and suppliers and, in general, business partners and prevent undue influence in the selection and recruitment processes.

Eurofinsa shall disseminate the contents and principles of this Code among suppliers and contractors and encourage them to report any irregular practices by persons of Eurofinsa that they may eventually observe.

4.4 Commitment to people

Personal respect and dignity

In Eurofinsa, the management of human resources and employee relations are always based on scrupulous respect for the dignity and rights of individuals.

The people of Eurofinsa should be treated in a respectful, professional and friendly manner to create a pleasant, safe and rewarding work environment, and encourage people to give their and with the aim of contributing to an appropriate social climate and a respectful coexistence in relations between the members of the organisation. Everyone in Eurofinsa shall also strive to be open, honest and respectful in sharing ideas and thoughts and when receiving the contributions of others.

Similarly, the relationships between the people of Eurofinsa and its suppliers, contractors and business partners will be based on respect and collaboration.

The people of Eurofinsa shall avoid and expressly reject the abuse of authority, and any form of harassment, physical, psychological or moral, and any other conduct that would create an intimidating, offensive or hostile work environment.

Also, Eurofinsa personnel shall remain alert and exercise proper control to avoid circumstances that might be illegal employment of foreign workers, both within the organisation and throughout its supply chain among suppliers, contractors and other business partners.

Similarly, employees of Eurofinsa shall remain vigilant to avoid that any case where they could be working for the organisation irregularly, have payrolls that do not reflect the relevant collective bargaining agreements or compensation items containing errors.

Equal opportunities, development and culture of merit

Eurofinsa employees shall not tolerate discrimination based on gender, race, sexual orientation, religious belief, political opinion, nationality, social origin, disability or any other characteristic.

The selection and promotion decisions in the organisation are based on equality of opportunity, merit and objective and transparent circumstances and assessments. Employees will learn the methodologies and procedures used for career development and advancement.

Eurofinsa undertakes to provide the means needed to contribute to employee learning and training and updating their knowledge and skills to facilitate their professional advancement and maximize their contribution of value for customers, shareholders and society in general. The people of Eurofinsa undertake to take advantage of the resources that Eurofinsa offers to improve their knowledge, skills and abilities which would allow them access to economic improvements, adequately perform their professional responsibilities and, in general, progress professionally.

Collaboration and teamwork

In Eurofinsa the collective takes precedence over the individual. Collaboration and teamwork are prerequisites for Eurofinsa to achieve its goals and maximize the capabilities, resources and diversity of knowledge, skills and experiences that are the foundation of the organisation.

The organisation promotes, facilitates and encourages collaboration and teamwork, regardless of functional area.

All employees must show a spirit of collaboration, making their knowledge, skills and talent available to persons in need thereof to contribute to the achievement of the objectives and overall interests of the organisation.

Similarly, the people of Eurofinsa shall work efficiently, taking full advantage and in benefit of the organisation, of the time and resources the organisation places at their disposal.

Safety and health of persons

In terms of safety and health, Eurofinsa's commitment is based on scrupulous compliance with the rules applicable in all environments where it operates, to offer its employees a safe and healthy working environment. The organisation also continuously improves the occupational risk prevention efforts and promotes a healthy working environment in each of the places where it is active.

Everyone in Eurofinsa is responsible for rigorous compliance with health standards and safety at work, ensuring their own safety and, in general, that of all people affected by their activities. They must use the equipment assigned to them responsibly when developing risk activities, and disseminate among their peers and subordinates knowledge and practices concerning health and safety and risk prevention.

Meanwhile, the organisation is committed to providing employees the resources and information necessary to perform their duties safely and in a healthy environment.

Eurofinsa personnel shall refrain from consuming alcohol or drugs in the workplace. Alcohol can only be served at business meals according to local practices.

Eurofinsa promotes and encourages the adoption of advanced practices in workplace health and safety among its suppliers, contractors, and business partners in general.

4.5 Environmental and social commitment

Eurofinsa approaches its environmental commitment with strict compliance with the applicable law in all its areas of operation. The organisation operates with the utmost respect for the environment and minimize the negative effects that its activities eventually may cause.

To this end, Eurofinsa establishes and promotes best practices among its employees and provides the training necessary to preserve the environment. In its relations with suppliers, contractors or business partners, Eurofinsa promotes these principles and requires compliance with environmental requirements and procedures that are applicable in each case and provides the appropriate means to ensure compliance therewith.

In this sense, the organisation is committed to correcting environmentally improper behaviour or any act not committed to the care of the environment that it may detect.

The organisation continually strives to identify, characterise and minimise the environmental impact of its activities and is committed to efficiency, responsible consumption and environmental protection. Everyone in the organisation shares this environmental commitment.

Eurofinsa is committed to acting responsibly in all countries where it operates. In particular, it assumes responsibility to contribute to the development of individuals and communities affected by its activities and, therefore, implement advanced practices in the field of corporate social responsibility.

Eurofinsa's commitment to society is implemented through the development of sponsorship, patronage and social action, undertaken by the organisation or channelled through support to social organisations. All donations made will have such authorisation as may be necessary or appropriate. Similarly, Eurofinsa will

encourage the collaboration of its employees with social projects and organisations in those places where it operates, through, among others, corporate volunteer programmes.

The organisation will also support those organisations with a strong reputation that can ensure the proper administration of the resources provided. All donations should be faithfully reflected as such in the records of the organisation.

5. Acceptance and compliance with the Code

The people of Eurofinsa are responsible for knowing, understanding and complying with the standards relevant to their position, responsibility and workplace. The organisation, meanwhile, will make available the necessary resources to facilitate knowledge and understanding of the regulations and legislation that are most relevant to the performance of their professional duties and the principles of conduct contained in this Code.

In case of doubt or witnessing irregular behaviour, workers may recur to their immediate superior and the Response Committee, which has among its tasks to ensure the dissemination, awareness and compliance with the principles of conduct set forth in the Code of Conduct and the rules under which it is based.

Eurofinsa expects of all employees behaviour aligned with the principles of conduct contained in this Code and the rules under which it is based. Compliance with the principles and standards indicated is one of the obligations of all employees of Eurofinsa contracted upon hiring.

No employee of Eurofinsa, regardless of his or her position in the organisation is authorized to contravene or ask a worker to contravene the provisions of this Code of Conduct. Similarly, no employee shall justify a bad practices by invoking an indication of a superior or ignorance of the Code of Conduct.

6. Notification of misconduct and Response Committee

Irregular behaviour in the matters set out in the Code of Conduct can have serious consequences for Eurofinsa.

Everyone in Eurofinsa is required to comply with the Code of Conduct and to help in compliance therewith and consult on any doubts and report any misconduct that he or she may observe. The reporting obligation also extends to cases in which misconduct has been detected by others and, in particular, suppliers, contractors or business partners.

Eurofinsa has a procedure that allows all employees to inform the organisation in good faith, in confidence and without fear of reprisals, of any misconduct in the areas covered by the Code, which concern matters of a criminal nature and otherwise, and any violation of the internal rules of conduct on which it is based. The people of Eurofinsa can also consult or suggest improvements in internal control systems in the organisation in the areas covered by the Code or target behaviours or areas where there is a significant risk of misconduct.

The management of issues related to knowledge, understanding and compliance with the Code of Conduct have been delegated to the Response Committee. Among the responsibilities assumed by the Response Committee in matters relating to the Code is to oversee the procedure for reporting misconduct. Thus, the Committee is assigned the following functions:

- Ensure the proper functioning of the notification and consultation procedure for reporting misconduct in relevant matters both from the standpoint of penal law or otherwise.
- Processing notifications received regarding irregularities in areas covered by the Code of Conduct, monitoring their resolution according to the procedure defined for this purpose and resolve any doubts arising regarding the implementation or interpretation of this Code of Conduct.
- Promote knowledge and understanding of the Code in the organisation.
- Report regularly to the governing body of Eurofinsa about the degree of compliance with the Code of Conduct, proposing recommendations, as necessary.

Employees can send their communications on issues related to the Code of Conduct, confidentiality, in good faith and without fear of reprisals, to the Response Committee by email to codigodeconducta@eurofinsa.com or to the following mailing address: Po de la Castellana 91. C.P. 28046 Madrid.

The Response Committee shall resolve doubts in regard to the application or interpretation of the principles of conduct contained in the Code of Conduct. The Response Committee shall benefit from the collaboration of the functional areas of Eurofinsa which are specialized in different subjects for the resolution of such doubts. The resolution of irregularities reported and any penalties shall be resolved in accordance with the specific procedure established for this purpose.

If the Response Committee considers that the irregularities notified could be "irregularities of particular importance", especially in criminal, financial and accounting matters", it may elevate the matter to the Governing Body of Eurofinsa, to decide the best way to resolve them.

All notifications received, which should preferably be registered, will be evaluated and treated as confidential. The data of the participants will be communicated only in the event that the complaint gives rise to proceedings by administrative or judicial authorities and to the extent as may be required by such authorities and in compliance Organic Law 15/1999, on the Protection of Personal Data, and where appropriate, those involved in any subsequent investigation or court proceeding following the investigation.

Eurofinsa will not tolerate retaliation upon those who make use of established procedures for reporting misconduct.

Everyone in Eurofinsa responsible for managing matters relating to the Code of Conduct will pay particular attention to ensuring the individual's right to personal honour.

7. Responsibilities

The people of Eurofinsa are responsible for knowing, understanding and complying with the principles of conduct contained in the Code of Conduct. Those employees who have management responsibilities or manage teams have some additional responsibilities.

Thus, people in the organisation must:

- Know, understand and comply with the commitments of conduct contained in this Code and the rules and procedures applicable to his or her position.
- Contribute, to the extent possible, to the knowledge, understanding and compliance with the Code.
- Ask for help if in doubt.
- Report any misconduct observed.
- Collaborate in the smooth functioning of the internal control systems implemented by the organisation to ensure compliance with the Code of Conduct and other internal rules of conduct of the organisation.

The people of Eurofinsa who have management or executive responsibility have additional responsibilities regarding the Code of Conduct:

- Collaborate in their area of responsibility, in the knowledge, understanding and compliance with the Code of Conduct and the rules and procedures on which it is based.
- Contribute to raising the ethical tone desired in the organisation, helping the organisation to know the expected behaviours.
- Provide support to those who in good faith, report misconduct in the areas covered by the Code of Conduct maintaining confidentiality and protecting them from reprisals.
- Observe professional conduct and set an example and reference for all workers in Eurofinsa. Their behaviour should be an example to follow.

8. Information and help

The Code of Conduct sets out the standards of behaviour expected of people within Eurofinsa.

In case of doubt, employees can get help from their immediate supervisor or the Response Committee.

If specific advice on the topics covered in this Code is required, employees can also recur to the functional areas and departments within the organisation who are specialists in such matters, such as the Legal Department, or Management Control Department.

9. Validity of the Code

The Code of Conduct will come into force when approved by the Governing Body of Eurofinsa and shall apply until the adoption of any update, revision or repeal.

The Code will be reviewed and updated as directed by the Governing Body. Any revisions and updates will comply with the commitments made by Eurofinsa on ethics and good governance and the new obligations arising from changes to applicable legislation. Any amendment hereof shall be notified to all employees



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