

# CODE OF ETHICS AND CONDUCT

CONFIDENTIAL

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## **1. MESSAGE FROM THE PRESIDENT**

As a corporate group, we are responsible for safeguarding the future of our business for the benefit of our employees, customers, partners and shareholders. Our commitment to sustainable growth is based on our passion for quality, reliability, accountability, customer service, business ethics and compliance.

We ensure integrity and best practices in everything we do and convey the importance of diligence and good faith by promoting a corporate culture based on regulatory compliance.

This Code of Ethics and Conduct, which is part and parcel of our Compliance Programme, sets out the principles and values required for good governance which are necessary for us to work together.

I encourage you to read this Code of Ethics and Conduct and to use it as a reference for all our day-to-day business activities, centring on the values of good faith, professionalism, ethics, transparency, integrity and good corporate governance.

This Code of Ethics and Conduct is a general guideline, and we all must become familiar with, respect and comply with it, together with the compendium of business regulations, protocols and control mechanisms deriving from it.

Warm regards

José María Romeu Loperena  
**President of the Board of Directors**  
**ROMEU**

## 2. OUR CODE OF ETHICS AND CONDUCT

This Code of Ethics and Conduct is included in the policies, protocols and manuals already in place in **ROMEU**<sup>1</sup>. It is intended to serve as a guideline and cornerstone of the ethical principles that all **ROMEU**'s employees, managers, directors and shareholders must take on board and apply in their daily business activities.

### 2.1. PURPOSE

The purpose of this Code of Ethics and Conduct (hereinafter the "Code") is to establish the principles and values that must inspire and govern **ROMEU**'s activities and relationships, including those of other **ROMEU** companies, their employees, managers, directors, partners and suppliers.

Likewise, the approval of this Code aims to facilitate daily operations in an ethical, serious, professional and honest environment in accordance with the fundamental principles of good faith, and full, ongoing compliance with current legislation. **ROMEU**'s mission is to promote a corporate culture built on compliance with the law and based on integrity, transparency and good corporate governance. Our goal is to prevent crimes and offences from being committed in **ROMEU** as efficiently as possible, and particularly to fight corruption in the public and private sectors in order to foster fair market competition.

### 2.2. SCOPE

This Code shall be binding and compulsory for all the employees, managers, directors, shareholders, suppliers and members at all levels that make up **ROMEU**. Subcontractors, intermediaries, agents, brokers and/or suppliers that do not have internal procedures or codes of conduct shall at least comply with the principles and provisions established in this Code.

It is everyone's responsibility, regardless of their role within **ROMEU**, to ensure this Code is complied with. No breach of this Code will be tolerated or permitted. Therefore, any conduct which goes against the Code, whether directly, indirectly or otherwise, must immediately be reported to **ROMEU**. The whistleblower reporting this breach of conduct will be protected in accordance with current regulations.

## 3. PRINCIPLES AND VALUES

### 3.1. GUIDING PRINCIPLES OF ROMEU

The principles established in this Code shall be implemented according to the protocols and control mechanisms included in **ROMEU**'s Compliance Programme at the time of its approval by the Board of Directors, as well as any others that may be added in the future.

**ROMEU**'s commitment to this Code is based on the following **guiding principles**:

- 1) **Integrity and ethics**: anyone who has a labour or other relationship with **ROMEU** must conduct their activities according to the highest standards of integrity, ethics and honesty and always in line with the principles and values established in this Code.

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<sup>1</sup> ROMINVEST, S.L. (Parent Company) and subsidiaries owned directly or indirectly by ROMINVEST, S.L.

- 2) **Compliance:** **ROMEU** is determined to fully comply with ethical standards and rules in its daily business activities. Accordingly, it completely rejects any inappropriate conduct, situation or activities that go against the guidelines of this Code. It steadfastly condemns all forms of corruption, money laundering, fraud and criminal offences, either alone or in collusion with others, in the course of its activities. To this end, **ROMEU** has provided its employees with an **Ethical and Compliance Channel** for reporting any misconduct that complies with the highest regulatory standards and guarantees.
- 3) **Corporate Social Responsibility:** **ROMEU** expresses its commitment to and the importance of conducting its business activities in a manner that shows respect for society, cultural diversity and customs. Therefore, all employees must maintain the utmost respect for human and fundamental rights, as well as nationally and internationally recognised public freedoms.

Responsible, sustainable growth is fundamental for the success of **ROMEU**.

- 4) **Employment equality and a safe and healthy working environment:** **ROMEU** promotes equality in the professional development of its employees and applies the principle of non-discrimination and the protection of health and safety in the workplace, so that they all have the same opportunities. All promotion decisions are based on objective criteria such as education and training, merit, hard work and, when necessary, on leadership skills and qualities.

Likewise, **ROMEU** is committed to providing all of its directors, managers and employees with decent, fair working conditions. One of its objectives is to encourage and promote Equality Plans, as well as programmes that facilitate work-life balance adapting to the personal and family situations and circumstances of its employees, managers and directors.

Similarly, **ROMEU** does not tolerate any abusive, hostile or offensive conduct. Nor does it tolerate discrimination on the grounds of race, gender, sexual orientation, belief, ideology, religion, social origin, disability, nationality, age or any other circumstance among **ROMEU** employees, regardless of their position or qualifications. Any type of harassment in the workplace, whether of a sexual nature or not, is also forbidden, and there is a specific protocol that can be activated upon any sign or suspicion of harassment, intimidation or mobbing.

- 5) **Respect for and commitment to the environment:** **ROMEU** is committed to its environmental protection and preservation policy. It strives to respect and look after the environment in order to be more sustainable and efficient, working systematically to promote and support Green Policies among its employees.

#### 4. ROMEU VALUES

To comply with these principles, **ROMEU** upholds the following fundamental values:

- 1) **Commitment and hard work:** **ROMEU** always honours its commitments, accepting responsibility and striving to exceed customer expectations. The objective is always to provide optimum results within the established deadlines by anticipating problems and future demands.
- 2) **Teamwork:** **ROMEU** encourages teamwork, respect and cooperation between all of its employees through the exchange of ideas. Likewise, it fosters collaboration and

mutual support among its employees, encouraging them to share their knowledge in order to achieve their goals.

- 3) **Loyalty: ROMEU** is loyal to its customers, partners and employees and always advocates honesty and integrity in its dealings with them.
- 4) **Sustainability: ROMEU** maintains the balance of the organisation through a sustainable, socially responsible economic model.
- 5) **Human integrity: ROMEU** is a highly ethical organisation in terms of its actions and those of its employees, based on respect, honesty and integrity. We promote open, transparent communication among all our employees.

## 5. STANDARDS OF CONDUCT

### 5.1. CORPORATE AND SOCIAL BEHAVIOUR

#### 5.1.1. FUNCTIONING OF CORPORATE BODIES

In our daily activities, we deal with people and companies that have business relations with **ROMEU** (suppliers, clients, third parties). It is important that any of the decisions taken in **ROMEU** are based on the interests of the organisation and not on any personal interests or relationships. To prevent and avoid possible any conflicts of interest, **ROMEU** has established a series of mechanisms and guidelines.

A **conflict of interest** may arise when employees have private or personal interests that impair the independent and upright performance of their duties within **ROMEU**. Private or personal interests are understood to be any possible agreement that benefits oneself, one's relatives, friends or acquaintances.

As a result, **ROMEU** cannot accept the existence of conflicts of interest between its employees, managers, directors or partners. Therefore, should a conflict of interest arise, the Chief Compliance Officer will immediately be informed through the internal channels established for this purpose (Ethical and Compliance Channel).

#### 5.1.2. RELATIONS WITH AND BETWEEN EMPLOYEES

Relations with and between employees must be based on the guiding principles of **ROMEU** described above. To this end, **ROMEU** prioritises:

- Compliance with labour laws and regulations.
- Absolute respect for the differences and opinions of others, with the consequent prohibition of all types of harassment and discrimination.
- Safeguarding its employees and facilities through safety equipment, devices, systems and procedures.
- Defining, communicating, and enforcing compliance with internal policies and regulations.

#### 5.1.3. RELATIONS WITH THIRD PARTIES AND THE MARKET

Business relations with third parties, understood as suppliers, customers, competitors and partners, as well as with investors and agents operating within their specific markets, shall be governed by the following principles:

### 1) Leadership and transparency

The administration and management of **ROMEU** will be entrusted to the most suitable people on account of their knowledge, qualities, experience and leadership skills, always based on a shared management model that harnesses the positive rapport and complementary skills of the directors of **ROMEU** companies.

## 2) Professionalism and solidarity

**ROMEU** shall be governed by applying strictly professional criteria, requiring its employees to be diligent, committed, proud of a job well done, responsible and loyal.

**ROMEU** employees, managers, directors and partners shall disregard their personal interests when making business decisions and shall aim to ensure that **ROMEU** is run and managed according to its best business interests and not to family or personal interests in order to create long-term value for shareholders and ensure total commitment to legality, safety and excellent risk management.

**ROMEU** shall assist employees, managers and directors in achieving their professional aspirations to the best of its ability. Employees, managers and directors of **ROMEU** whose conduct and personal endeavour are not consistent with the professional demands they make will not have the right to obtain this assistance.

## 3) Fair competition and antitrust policies

**ROMEU** is committed to carrying out its day-to-day business in accordance with the Spanish and European Union Antitrust and Unfair Competition Regulations. It specifically commits not to engage in any conduct deemed to be illegal, according to the aforementioned regulations.

The Chief Compliance Officer must be contacted before signing agreements and contracts that may violate trade and competition laws or regulations.

Should any **ROMEU** companies become dominant in a market or geographical region, additional precautions should be taken in order to avoid any tactics that could be interpreted as an intention to exclude or prejudice current or potential competitors.

**ROMEU** is committed to competing fairly in the market, thereby promoting free competition for the benefit of users and consumers while complying with current legislation.

### 5.1.4. RELATIONS WITH GOVERNMENT OFFICIALS

The conduct of **ROMEU** employees, managers and directors who may have some type of relationship with government officials, whether national or foreign, holding an elected office or not, must always be characterised by transparency, ethics, integrity, and cooperation.

Actions that involve the giving, acceptance, consent or offering of gifts, presents, excessive hospitality or hidden commissions, among others, to government officials or to people closely related to them, must never be carried out in the name of **ROMEU** or of its companies.

Donations that seek to influence government, or whose purpose is to obtain an unlawful commercial advantage shall be strictly forbidden.

Contributions (as an employee or on **ROMEU**'s behalf) made to political parties, regardless of their affiliation or orientation, are also prohibited.

Nor may a personal or family relationship with a public authority or public official be asserted, irrespective of the reasons behind it. The same conduct must be followed in contacts with foreign officials and/or government.

#### **5.1.5. RELATIONS WITH SUPPLIERS AND THIRD PARTIES**

**ROME**, within a framework of confidentiality and respect, seeks to give all suppliers the same opportunities to establish contracts with them without generating false expectations and always maintaining coherence, independence and integrity in the selection process. Supplier assessment is based on **ROME**'s principles of good governance, integrity, responsibility and diligence.

**ROME**'s commitment to respect for human rights and ethical conduct also involves encouraging and monitoring compliance among the individuals and organisations that comprise its supply chain, such as suppliers.

Therefore, **ROME** shall, whenever possible, include clauses in its supplier contracts that require compliance with the principles set out in this Code of Ethics and Conduct. Additionally, it will assess supplier compliance with these principles.

#### **5.1.6. THIRD-PARTY INTERMEDIARIES**

Ignorance is not a valid excuse for violating anti-corruption laws. Before dealing with any third parties and intermediaries, **ROME** must ensure they have a good reputation and are willing to comply with this Code of Ethics and Conduct. If necessary, the Chief Compliance Officer shall be entitled to conduct a comprehensive check of these third parties and collect any necessary documentation about potential intermediaries.

Likewise, third-party intermediaries partnering with **ROME** shall undertake to sign this Code of Conduct, being aware that any inappropriate management on their part may be detrimental to **ROME**, both in terms of potential damage to clients as well as to its excellent image and reputation.

#### **5.1.7. OCCUPATIONAL HEALTH AND SAFETY**

**ROME** is convinced that it provides its employees with a safe workplace that complies with occupational health and safety legislation. Therefore, **ROME** workplaces are healthy, appropriate and adapted to all employees.

**ROME** employees shall scrupulously comply with occupational health and safety standards.

Likewise, **ROME** employees are expressly forbidden from going to work under the influence of any type of drugs or any toxic, psychotropic or narcotic substance, including alcohol, while they are performing their assigned duties.

Similarly, **ROME** employees shall not be permitted to carry weapons or potentially dangerous instruments, unless this is required for work purposes.

**ROME** employees shall inform their superiors of any violation of occupational health and safety regulations committed by other members of the organisation or by a third party (suppliers, clients and subcontractors that access facilities, etc.) and shall inform the Chief Compliance Officer and the Head of Human Resources or make this known through any of the other channels of communication available to **ROME** employees.



## 5.2. CONDUCT WITH REGARD TO CORPORATE RESOURCES

### 5.2.1. CONFIDENTIALITY

#### 1) Privileged, confidential information belonging to ROMEU

All **ROMEU** directors, managers and employees have the duty and obligation to safeguard the confidentiality of all the company information that could be classified as privileged, confidential, reserved and/or secret. This means it cannot be disclosed and certainly not used for personal benefit. The term **confidential information** is understood to be:

- All non-public information that affects **ROMEU's** business in the broadest sense: details regarding clients, markets, financial data, methods and processes. This information may not be disclosed under any circumstances, without the express authorisation of the person responsible for the organisation.
- Information made available by third parties to **ROMEU**, which is subject to non-disclosure agreements.

By way of example and without limitation, the following information is considered to be confidential or privileged information:

- Accounting information and financial forecasts.
- Mergers, acquisitions, partnerships, expansion plans and business plans.
- Financial operations.
- Business and operating policies and practices.
- Judicial and/or administrative disputes.
- Organisational changes.
- Research and development of new products.
- Personal information about **ROMEU** employees.
- Intellectual and industrial property, such as industrial secrets, registered trademarks, patents and copyrights.
- Customer and supplier lists, price structures and policies, business cards.
- Software screen images and instruction manuals.
- Information related to advertising, communication and corporate image.

When disclosing this information, there are two specific scenarios that must be taken into account:

- When confidential information must be disclosed to perform an activity, all possible precautions and measures should be taken to protect its confidential nature.
- When this information concerns a third party, it may only be disclosed with the third party's approval.

**ROMEU** agrees to take the necessary measures to protect the classified and confidential information by signing a **legally binding non-disclosure agreement** with all third parties, with all the existing legal guarantees.

All files shall be carefully stored according to current legislation and to **ROMEU's** internal policies and procedures.

All **ROMEU** employees shall inform the IT Department of any incidents that may occur in the information systems to which they have access.

An incident is understood to be any irregularity that affects or may affect data security.

Any incident must be reported immediately and always on the same day it is discovered.

Likewise, the Chief Compliance Officer must be informed of any reasonable evidence of a leak of classified, confidential information and of any specific use of such information, as soon as this becomes known.

## 2) Personal data

**ROMEU** and its employees who, by virtue of their position, have to deal with personal data belonging to employees, managers, directors and partners shall only be able to use such data in accordance with the provisions of the General Data Protection Regulation (EU) 2016/679 and Spanish Organic Law 3/2018, of 5<sup>th</sup> December, on the Protection of Personal Data and the guarantee of Digital Rights and the regulations developing them, and by following the internal procedures implemented within **ROMEU** at all times. Likewise, personal data processing must be adapted to the purpose for which it was collected.

No personal data may be processed without the Data Protection Officer's (DPO) prior review and authorisation.

Any other activities which are also expressly prohibited in this document or in the Spanish Data Protection Agency's regulations and instructions are also forbidden.

**ROMEU** is committed to information security and personal data protection and has implemented the necessary measures, including the appointment of a Data Protection Officer (DPO) to control and safeguard privileged information.

### 5.2.2. INTELLECTUAL AND INDUSTRIAL PROPERTY

**ROMEU** protects its industrial and intellectual property rights and respects the rights of third parties in this matter.

Given the capacity for innovation and the endeavours of its employees, managers and directors, **ROMEU**, its clients and its suppliers may be able to generate ideas, services, strategies and business opportunities which must be protected from disclosure and dissemination.

These Industrial and Intellectual Property rights can materialise in a variety of different ways (processes, designs, methods, commercial strategies, client information, prices, etc.). Therefore, the employees, managers and directors of **ROMEU** may not disclose, obtain copies or use such rights for personal or unlawful benefit. Similarly, they may not assign them to third parties without the prior, express authorisation of **ROMEU**, since the industrial and intellectual property rights developed within **ROMEU**, using the organisation's resources, are the property of **ROMEU**.

Likewise, additional diligence and care must be used when dealing with information related to the industrial and intellectual property rights of clients or third parties. *The reproduction of third-party material protected by intellectual or industrial property rights is completely prohibited.*

It is also forbidden to manufacture, import, possess, use, offer or place on the market objects or procedures protected by industrial property rights without the consent of their owner, including patents and utility models, and industrial and artistic models or drawings, among others.

### 5.2.3. SAFEGUARDING OF ASSETS

All **ROMEU** employees are responsible for the custody and safeguarding of the assets under their control. These employees must never, under any circumstances, participate in, influence, or enable situations or actions that are linked to the unauthorised theft, robbery, misuse, loan or sale of assets.

Likewise, the assets owned by **ROMEU**, as well as the services they have at their disposal, must be used solely and exclusively for the benefit of **ROMEU**. Under no circumstances may they be used for other purposes without the authorisation of the person in charge of the relevant department and of the Chief Compliance Officer .

If such assets and/or services are used for charitable purposes or donations, authorisation must be obtained from the person in charge of the relevant department and from the Chief Compliance Officer .

### 5.2.4. GIFT AND HOSPITALITY POLICY

The exchange of gifts and hospitality between customers and suppliers is sometimes a legitimate way to build trust in business relationships. However, when gifts or hospitality are given in excessive or inappropriate amounts, they may serve to exert undue influence and may represent bribes or be perceived as such.

As an exception, giving and/or accepting gifts or hospitality to/from clients/suppliers may be permitted when all of the following three conditions are met simultaneously:

- a) Gifts that are permitted under current legislation and that cannot be interpreted as an incentive to act in a way that may distort professional impartiality and objectivity.
- b) Gifts that are given or received, as part of an accepted business practice or social courtesy, which were not requested.
- c) Gifts that have a symbolic or economically insignificant value.

The parties receiving this hospitality shall reject or return all gifts or invitations that do not comply with the abovementioned conditions, provided that this does not constitute a legal infringement or a serious offence for the person or organisation offering the gift, in which case the Chief Compliance Officer must be informed.

### 5.2.5. THE ENVIRONMENT

**ROMEU** is committed to looking after and respecting the environment in its day-to-day business. Therefore, it implements the necessary measures to conduct its activities in such a way as to minimise any negative environmental impact and to achieve the highest level of safety in its processes, facilities and services, paying special attention to safeguarding its employees, suppliers, clients and the environment.

**ROMEU** guarantees the safety of all the legally bound parties by complying with the specific prevention measures, thereby contributing to the safety of others and to protecting the environment.

## 6. LEGAL COMPLIANCE

All **ROMEU's** directors, managers, partners and employees shall comply with and abide by current legislation, regardless of its scope, when performing their respective duties and activities, especially when these involve operations that have obvious social repercussions or when people from the political sphere are involved.

**GROUP ROMEU** is committed to upholding the values of honesty and integrity in all of its actions, rejecting all forms of corruption, and constantly respecting the specific needs and circumstances of all those involved in conducting the organisation's business activities.

## 7. SUBCONTRACTING

All companies contracted by **ROMEU** to provide or perform services must comply with this Code. **ROMEU** is responsible for ensuring compliance with this Code in all actions pertaining to these subcontracted firms.

Therefore, no contracts will be outsourced to companies that do not fully respect workers' rights, uphold occupational health and safety provisions, or whose employees do not comply with all current labour provisions and legislation.

If a subcontracted company is not willing to adapt its activities to comply with this Code of Ethics and Conduct, either by signing the corresponding agreement or acceptance clause, or it does not have its own similar Code of Conduct, no contract will be signed with it. This will also constitute a cause for termination of any contracts already in force.

## 8. ETHICAL AND COMPLIANCE CHANNEL

An internal Ethical and Compliance Channel represents an effective method of identifying and correcting shortcomings in a company. It provides a channel for employees to report irregular practices or conduct within the organisation.

Through the Ethical and Compliance Channel, **ROMEU** guarantees that all the organisation's employees, acting in good faith, can report any irregular conduct confidentially without suffering any repercussions or discriminatory action for doing so.

Thus, **ROMEU's** employees can report any irregularity, non-compliance or violation of the conduct and provisions regulated in this Code through the internal (and external when appropriate) Ethical and Compliance Channel.

Employees will be able to report possible irregularities, unlawful activities and any conduct that contravenes current legislation or **ROMEU's** internal regulations that could lead to some type of liability (criminal, civil or administrative) for the organisation. This communication channel may also be used to introduce questions, innovations and ideas, which could contribute to improving our business ethics culture on compliance.

Complaints can be made through **ROMEU's** Ethical and Compliance Channels or through any other future channels established for this purpose by management, Human Resources, mailbox, e-mail or any other means provided on the web platform and Employee Portal, as well as through the Chief Compliance Officer .

The Chief Compliance Officer is the person responsible in **ROMEU** for handling all the complaints received through the Ethical and Compliance Channel, which will be duly investigated.

Based on the complaints received and their subsequent investigation, the Chief Compliance Officer may be able to draw major conclusions about potential monitoring failures that led the irregular practices to take place and accordingly implement any additional control measures.

## **9. APPROVAL OF THE CODE OF ETHICS AND CONDUCT**

This Code of Ethics and Conduct shall be approved by **ROMEU**'s Board of Directors, who will proceed to issue the necessary rules for its implementation. **ROMEU** shall be responsible for permanently updating this Code to make sure that it always reflects the current social and legal realities.

All **ROMEU** directors, managers and employees are responsible for abiding by the principles, guidelines and directives contained in this Code and ensuring its compliance. If they suspect any non-compliance with the provisions of this Code, they should immediately inform their superior or the Chief Compliance Officer, through the channels established for this purpose.

Employees shall be protected against any form of retaliation and their identity shall be safeguarded. Only the people in charge of processing a complaint or communication will have access to this information.

## **10. DISCIPLINARY MEASURES IN CASES OF NON-COMPLIANCE**

When necessary, **ROMEU** may penalise employees, suppliers, or business partners for violations of this Code of Ethics and Conduct.

Failure to comply with the Code's provisions, or any protocols and procedures which develop or complement it, may result in the corresponding disciplinary penalties in accordance with the statutory regime, the Collective Bargaining Agreement, labour legislation and all other civil and business obligations that the employee has contracted with **ROMEU**.

In the case of a criminal offence, **ROMEU** will involve the relevant authorities and fully cooperate in any legal proceedings.

## **11. DISSEMINATION OF THE CODE OF ETHICS AND CONDUCT**

The Code of Ethics and Conduct will be disclosed and disseminated to all **ROMEU** employees through the Employee Portal, by e-mail, on the web site, and by any other relevant channels. All the Directors shall cooperate in the abovementioned tasks within their respective scope. The Code will be disseminated according to the corresponding internal and external action plan.

Barcelona, 19<sup>th</sup> December 2019

Updated, 17<sup>th</sup> October 2022