

CODE OF ETHICS

EURO-FUNDING ADVISORY GROUP, S.L.

TIN B85727188

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Your P&L is our DNA

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1 INTRODUCTION

1.1 Definition of the Code of Ethics

The Code of Ethics (hereinafter “the Code”) of Euro-Funding Advisory Group, S.L., and its subsidiaries (hereinafter all together Euro-Funding), is the main internal rule of mandatory obedience, which establishes the ethical principles and conduct guidelines that govern the behaviour and actions of Euro-Funding personnel regardless of their functions and responsibilities, their position in the organizational chart and any other personal, social, or work circumstance.

Vision: provide economic improvements to the income statement of our clients.

Mission: grow profitably and sustainably accompanying our clients wherever their projects are, providing a local service with global solutions.

Competitive advantages:

- Team.
- Experience.
- Specialization.
- International network.

Team Values:

- Integrity: confidentiality and honesty.
- Excellence: service and technical accuracy.
- Customer focus: flexibility and results.

2 SUBJECTIVE SCOPE

2.1 Who must fulfil this Code?

The Code of Ethics is applicable to partners, administrators, counsellors, directors, committee heads, executive directors, representatives, proxies, advisers, consultants, permanent and temporary staff, subcontracted staff, auditors, contributors, suppliers, as well as, in general, to any person or entity with which Euro-Funding maintains a contractual, labour or commercial relationship (hereinafter, indistinctly, the "Person Subjects" in the plural, or "Person Subject" in the singular).

The Person Subjects must know, comply with, and apply the Code of Ethics and, therefore, respect the values, principles and standards contained in the Code, both in their professional relations with Euro-Funding and the rest of the Person Subjects, as well as in their relationships with customers, suppliers, competing companies, Public Administrations, and society in general.

Every Person Subject has the obligation and duty to ensure that all the Person Subjects know, observe with, and apply this Code.

3 GUIDELINES OF CONDUCT

3.1 Obligation to comply with the law

We carry out all our actions in compliance with this Code and the national and international laws that apply to us.

3.1.1 Global compliance

Person Subjects must comply with, obey, and apply the laws, resolutions, directives, statutes, regulations, orders, ordinances, suggestions, and internal rules of Euro-Funding that are currently in force and applicable to our operations.

Euro-Funding provides Person Subjects with training and advice on the laws, policies, values, and culture of Euro-Funding, which are applicable in each case, to make the appropriate clarifications and resolve any doubts that may exist. Euro-Funding makes its services and departments available to those, especially the legal and regulatory compliance department.

3.1.2 Obligation to collaborate with investigations

The Person Subjects have to support, facilitate and cooperate with any investigation by the Public Administrations, regulatory bodies, the Administration of Justice or by Euro-Funding itself, the Legal and Compliance Department or any person or entity designated for that purpose.

3.1.3 Information on judicial or administrative proceedings

Any Person Subject who, as a consequence of their relationship with Euro-Funding, appears before a judicial body, before an administrative body or before any public authority, including the Administration of Justice and the State Security Forces and Bodies, as a denounced party, defendant, required or witness, must inform in advance both his hierarchical superior with the rank of Director and the Director of the Legal Department of Euro-Funding in a truthful, complete and immediate manner.

The Person Subject who finds himself in this situation must inform Euro-Funding about the result of the investigation in an equally truthful, complete, and immediate manner.

3.2 Respect

The Person Subjects must always respect the People, the Environment, the Culture, and the Customs of other Countries.

3.2.1 Respect for People

Euro-Funding considers respect for the dignity of every human being by the fact of being such a fundamental value and, particularly, respect for the dignity of all the people who make up Euro-Funding, its clients, suppliers, partners and, in general, respect for the dignity of any person who has had, has, or may have any relationship with Euro-Funding.

Euro-Funding requests special care in conformity with the regulations on the protection of Fundamental Rights and Public Liberties, invoking the Universal Declaration of Human Rights, signed by the United Nations in 1948, the International Convention on Civil and Political Rights of 1966, the International Convention on Economic, Social and Cultural Rights of 1966, as well as the Convention for the Protection of Human Rights and Fundamental Freedoms of 1950.

Euro-Funding also assumes and particularly respects the Tripartite Declaration of Principles of Multinational Companies and Social Policy of the International Labour Organization, as well as the principle of union representation of its employees.

Euro-Funding has a zero tolerance strategy against harassment, bullying, abuse of authority, verbal abuse, slander, threats, offenses, discriminatory treatment based on race, colour, nationality, origin, idiom, religion, gender, opinion, ideology, affiliation, age, sexual orientation, marital status, status –including pregnancy–, social and family status, physical appearance, disability and other situations protected by law, both with respect to employees, managers and the members of the Administrative bodies, as with respect to the company's partners, clients, potential clients, suppliers and any other person. The goal is that relationships in the workplace must be professional, free of prejudice, discrimination and/or harassment.

Euro-Funding promotes equal opportunities among employees regardless of their gender, race, social status, opinion, age, creed, or nationality.

Euro-Funding respects the private life of the Person Subjects and does not interfere in the activities or conduct that they carry out outside the professional sphere, if such activities or conduct do not affect the performance of their duties within Euro-Funding or harm the good name of the Euro-Funding or its legitimate interests.

All Person Subjects have the right to sympathize and belong to a political or trade union organization, although any activity, militancy and/or economic contribution must be personal and must not interfere with the performance of their duties. Linking Euro-Funding with political parties or organizations, elected officials or public figures is prohibited.

Euro-Funding believes in the human profile of companies and in their commitment and responsibility to society, collaborating with various foundations in the development of humanitarian projects as part of their Corporate Social Responsibility policy.

3.2.2 Respect for the Culture and Customs of the Countries

Euro-Funding considers diversity as something positive and encourages respect for the cultural differences and customs existing in the countries where operates.

Relationships of the Persons Subject with people from other countries must be free of prejudices, presided over by tolerance and positive attitudes, with recognition of the values of their cultures, respecting their traditions and customs, favouring a cordial and respectful understanding.

3.2.3 Respect for the environment

The protection of the environment is inherent to Euro-Funding, promoting a preventive approach through internal policies.

Persons Subject protect and respect the environment, minimizing the environmental impact of their activities and the use of facilities, equipment and means of work made available to them, seeking efficient use of them, assuming and observing with corporate policies.

Within the scope of our activities, we are committed to mitigating climate change, making sustainable use of water resources, promoting a circular economy, preventing and controlling pollution, and protecting and recovering biodiversity and ecosystems.

3.2.4 Commitment to the Sustainable Development Goals

As part of our business activities and corporate social responsibility policy, Euro-Funding is committed to contributing to ethical development by achieving the Sustainable Development Goals (SDGs) adopted by the United Nations. Additionally, Euro-Funding is committed to establishing regular monitoring and evaluation mechanisms to measure the degree of compliance with the objectives, as well as to report annually on the actions taken and the results obtained.

3.2.5 Security and health at work

Euro-Funding adopts the measures established in the legislation of each country, so that its employees carry out their work in safe and healthy places, so that safety and health at work is in accordance with the applicable regulations at all times.

Euro-Funding provides its employees with the necessary resources and knowledge to carry out their functions safely and in a healthy environment, ensuring the safety of all the people who may be affected.

Likewise, Euro-Funding also applies its standards and policies on health and safety at work to the collaborating companies and suppliers with which it operates.

3.3 Honesty and transparency

Honesty and transparency are two fundamental elements in our activities. By complying with these principles, we build trust with our clients and acquire a better reputation.

3.3.1 Protection of competition

Euro-Funding respects and encourages free, fair, and honest competition, promoting discipline in the execution of our activities.

Therefore Euro-Funding forbids:

- Abusive and disproportionate practices to establish a dominant position in the market.
- Decrease of prices below its cost to eliminate competitors or prevent their access.
- Fixing of prices or other commercial terms, directly or indirectly, agreeing discounts, minimum prices, or prices to exclude competitors.
- The distribution of markets or customers.
- The limitation of production; the application of unequal conditions for equivalent benefits; the subordination of the conclusion and perfection of contracts to the acceptance of supplementary benefits.
- Hedging offers (agreement to favour the award of a bid), withdrawn offers (withdrawing an offer so that it is awarded to the winner) and offer rotation (companies participating in a tender agreeing turns to be awarded).
- Contacts with competitors that may give rise to an image of non-compliance with antitrust regulations, except for meetings held through conventions, congresses, seminars, etc., where competitors from the same sector as Europe-Funding. Personal contacts with those people who are competitors are allowed, respecting the prohibitions.

Euro-Funding promotes equal opportunities with customers and suppliers, promoting a competitive market and applying similar conditions to all of them.

3.3.2 Conflict of Interest

Persons Subject act for the benefit of Euro-Funding, seeking its benefit, so they are forbidden from benefiting from the opportunities that arise due to their provision and/or within the framework of their professional activity or using assets or information from Euro-Funding, and it is also prohibited to benefit related people with them.

There is a situation of conflict of interest when, in the performance of your duties, the personal interests of the Persons Subject, their relatives or third-party natural or legal persons with whom they are linked directly or indirectly collide, and the interests of Euro- funding. These situations should be avoided, whether they are real or potential.

When a possible conflict of interest arises, the Person Subject must communicate it through the Direct Channel for the knowledge of Euro-Funding and its resolution. Also, when it is warned that it may occur. In the event of a conflict of interest, Euro-Funding's interest is always preferred.

Person Subjects refrain from intervening and/or participating in transactions of any kind in which their own interest or that of a related person or entity concurs.

The following situations are considered a conflict of interest, among others:

- Being employed in another company outside Euro-Funding.
- Carry out public conferences without the authorization of Euro-Funding.
- Reference third-party companies, employees, or managers of Euro-Funding.
- Develop new products, inventions, and writings for other corporations.
- Sell Euro-Funding services to other companies without authorization.
- Be a partner of a company that competes or is a client of Euro-Funding.

Persons Subject do not favour Euro-Funding's hiring or business relationships with themselves or with family members or third parties, such as suppliers, with whom they have a direct or indirect personal relationship. If there are contracts with relatives and/or with third parties with whom the Person Subject has a family or friendship relationship, this must be communicated in advance to the Director of Compliance and the General Director of Euro-Funding for their approval.

3.3.3 Relations with the Public Administration

In its activities, Euro-Funding have direct and indirect relations with local, regional, autonomous, national, and international Public Administrations (understanding Public Administration anybody, entity, agency and/or company of a public or semi-public nature, at national and/or international).

Persons Subject are honest and precise with the agreements and contracts signed with the Public Administration. We respect public bodies, providing all the information required, in real time, in a truthful and transparent way, always acting in accordance with the principles and criteria of legality and good faith.

Bribery

Payments, gifts, or other courtesies in favour of third parties with the aim of acquiring an illegal or immoral benefit may constitute a crime, and both Euro-Funding and the person or persons who carry out, go to realize, or support such benefits.

It's forbidden to offer, promise, deliver, request, receive or accept money, goods or favours of any kind that give an advantage over third parties. It's also prohibited, directly or indirectly, the delivery or promise of delivery of any amount of money, gifts, favours and the provision of free services or benefits below their value to officials, politicians, political parties, public employees or relatives of these, nationals, or foreigners, by reason of the position they hold in the Administration.

Grant fraud

The illegal and/or fraudulent obtaining of subsidies or grants from any Public Administration by falsifying or simulating the conditions required for their concession, as established in the current legislation, is prohibited.

Prevention against money laundering

Euro-Funding fulfils with national and international regulations in relation to money laundering and terrorist financing, through procedures for the prevention and detection of suspicious payment processes.

Euro-Funding prohibits cash transactions for amounts of one thousand euros or more (or the equivalent in foreign currency).

Any suspicious activity should be reported immediately to the Legal and Compliance Manager to review procedures and verify legality.

3.3.4 Openness

Euro-Funding acts clearly with its partners, clients, suppliers, employees and before society as a fundamental element of its management.

With clients

Euro-Funding provides its clients with accurate, truthful, and understandable information on its products, services, operations, and procedures to manage suggestions, claims, complaints and resolve incidents.

With suppliers

Euro-Funding hires its suppliers within a free competition and regardless of any relationship or obstacle because relationships with them generate value for both parties.

The purchase of goods and services is carried out with impartiality and openness, avoiding situations that affect the objectivity of the people who participate in them, so it is carried out regardless of any family, economic or friendship ties.

Audit and accounting

Euro-Funding's activity means adopting decisions that have consequences and incidence in the tax field. Therefore, it complies with its tax obligations in all the territories and jurisdictions in which it carries out its activity, with a prudent tax policy based on a reasonable interpretation of the legislation.

Euro-Funding do not use opaque structures for tax purposes and does not operate in tax havens except for commercial or business reasons. It also collaborates with the Tax Authorities and establishes relationships based on respect for the law, trust, professionalism, loyalty, reciprocity, and good faith.

The accounting and economic books exhibit in a transparent, faithful, truthful way and in real time its financial situation, observing and following the generally accepted accounting criteria, recording this information without delay.

In the same way, we apply the law for the conservation of commercial and accounting documents.

Delivery of gifts and granting of benefits or advantages

Outside of the strictly private circle, it's forbidden for Person Subjects to deliver, promise, or grant benefits, gifts, or advantages in favour of third parties, including the rest of Person Subjects. Only in exceptional circumstances such as anniversaries, commemorations or specific dates may gifts, benefits or advantages be delivered when their amount is equal to or less than two hundred euros (€200) and provided that these circumstances are met: (i) the Person Subject previously informs the Director of Human Resources of the delivery of the gift, advantage or benefit; (ii) he has authorized the delivery; and (iii) it is something specific.

If the price of the gift or the amount of the benefit or advantage is greater than two hundred euros (€200), the Person Subject requires the prior and express approval of the compliance body.

To calculate the price of the gift or the amount of the benefit, its total value will be considered; and if several gifts are made and/or different advantages and/or benefits are granted within the same calendar year, the global sum of all of them will be computed.

Notwithstanding the foregoing, the following cases are excluded from the information, authorization and approval requirements established above:

- The gifts, benefits or advantages included in the promotional programs and activities that have been approved by the Management Committee or the administrative body.
- Gifts of promotional material that are made within the framework pre-established by Euro-Funding for its use.
- The benefits or advantages in favour of clients based on the commercial policies that have been approved by the Management Committee or the administrative body.

Acceptance of gifts, advantages, or benefits

Persons Subject cannot accept gifts, advantages or benefits from customers or suppliers and from people who provide their services or supply their products for any of the current or potential Euro-Funding companies.

Person Subjects may receive gifts, advantages and/or benefits made within the framework of a corporate or institutional policy of the grantor, in a non-individualized way for the recipient, of a generic way, and at specific moments such as anniversaries, memorials, corporate events and appointed date. The price of such gifts must always be equal to or less than two hundred euros (€200). To calculate the price of the gift or the amount of the benefit or advantage, its total value will be considered; if several gifts are made and/or several different advantages and/or benefits are granted within the same calendar year, the total amount of all of them will be computed.

When a Person Subject receives a gift, advantage, or benefit, they must inform the Human Resources Manager prior to their acceptance and the latter authorize it, if applicable, expressly.

Persons Subject may accept occasional invitations to attend corporate events organized by clients or suppliers, as well as to attend institutional, sporting, or cultural events, provided that, with few exceptions, such events are outside the business hours of the company. Person Subject and, in any case, with the mandatory requirement that the Person Subject previously advise the Director of Human Resources and must be expressly authorize the attendance of the Person Subject at the act or event referred. The price of such invitations must always be equal to or less than two hundred euros (€200).

The Management Committee and the administration body of Euro-Funding may establish exceptions to the rules of this section when there are well-founded, always within the law, it can be considered an acceptable practice and it is treated it as an occasional gift or benefit.

Use and Protection of Euro-Funding assets

All Persons Subject have the duty to be careful with the Euro-Funding's assets, which can only be used within the scope of Euro-Funding and for its exclusive benefit.

The Persons Subject who gives the Euro-Funding's assets for a charitable work or for a social action must previously receive the express authorization of the administration body.

In any case, the rules for the use of resources, computer programs and the intellectual and industrial property of all the goods used in Euro-Funding must be observed. Programs not approved by Euro-Funding cannot be used in assets.

Euro-Funding provide to its workers the necessary equipment to carry out the job. Such equipment is owned by Euro-Funding and is expected for work-related uses.

The computer equipment can only be used for personal use in a limited way, always prioritizing the professional, with respect for the content of this Code of Ethics and preserving the confidentiality of all information.

The people who use Euro-Funding's computer equipment are hereinafter referred to as 'User', in the singular, or 'Users', in the plural.

Euro-Funding provides each User with a username and password with which to access their computer equipment and, where appropriate, the Intranet.

Euro-Funding and the IT staff are responsible for defining the basic hardware and software configuration of the IT equipment, as well as managing Internet access.

All information created, stored and/or sent from Euro-Funding's computer equipment and systems is its exclusive property.

The User must do the following:

- Do not modify the configuration and/or software of the equipment, install or uninstall programs or any other type of software, and use or connect other devices or equipment at the User's initiative.

- If you detect or suspect the existence of a computer virus or malicious software on your computer, you must notify Euro-Funding's IT staff immediately, abstaining from taking any action without following the instructions of the IT staff.
- In relation to computer equipment, the Internet, mobile phone and email, it is forbidden:
 - Carry out illegal activities of any kind and access, distribute from the computers, content of an offensive, racist, violent, xenophobic, pornographic, sexist nature, apology for terrorism or an attack on the rights to privacy, honour, image or against the dignity of persons.
 - Introduce files, programs, viruses, spyware, or any other systems likely to cause damage to the equipment on the computers.
 - Using usernames other than the one assigned.
 - Breach the confidentiality of the information of Euro-Funding or third parties.
 - Access computer equipment and email accounts assigned to other Users without the prior authorization of Euro-Funding.
 - Use the equipment, files, programs, and information owned by Euro-Funding on your own benefit and/or of third parties.
 - Engaging in political activities that call into question the independence of Euro-Funding.

Euro-Funding adopts control and surveillance measures in the assigned tools and professional email accounts, consisting of access, inspection and auditing of all information generated, stored or entered in the computer media of Euro-Funding, which they disseminate through professional email accounts and which they access on the Internet from computer equipment, so they cannot generate or store on the equipment, or send from email accounts email assigned by Euro-Funding, private or third-party content.

Users may not export, assign, sell, or deliver information from Euro-Funding to third parties, without the prior and express authorization of their hierarchical superior with the rank of Director or, failing that, the Corporate General Manager or administrative body.

3.4 Excellence and professionalism

We take the satisfaction of our clients as the target of our professional performance

3.4.1 Service to customers

Euro-Funding has the clients at the core of its activity. Through this commitment, it creates value for them and for the environment.

In all relationships with clients, Euro-Funding is committed to maintain a high guarantee to honesty and professional responsibility.

Euro-Funding's quality policy pursues customer satisfaction with the quality of the service, delivery times and price, parameters that are always evaluated.

The Quality Systems implemented in Euro-Funding are designed and certified based on models and standards of recognized prestige.

Any complaint must be dealt quick and seriously. Euro-Funding has procedures to resolve differences. In such cases, we act honestly and reasonably and try to solve problems quick and efficiently.

3.4.2 Professionalism and teamwork

Euro-Funding's prestige is the result of people who make it up and to the values and principles that motivate them. Euro-Funding values each person's abilities and contributions, guiding its members to take sense of dedication and looking for excellence.

3.5 Confidentiality and privacy

We preserve the confidentiality of the information of Euro-Funding, that of our partners, that of our suppliers and that of our clients

Information is one of the main assets of Euro-Funding and, for this reason, preserving the confidentiality of its own information and the one of our suppliers and clients, is one of the fundamental reasons on which the relationship of trust is based.

3.5.1 Use of information

We only use the information received from customers, suppliers, and employees to fulfil the purpose for which it is delivered. Before communicating information to third parties, all Person Subjects make sure they are authorized and that they do so in favour of people who have a legitimate reason to have it. Even in case of being allowed, it is necessary to limit the information to be communicated to the necessary. In case of doubt, before its transmission, raise a query with the Director of the Legal Department.

Person Subjects do not access information when is not necessary for the performance of their duties.

3.5.2 Contractual and accounting documentation

Persons Subject are diligent in the treatment of contractual and accounting documentation and, in any case, do not destroy, modify, conceal and/or manipulate any contractual or accounting document to hinder, obstruct or prevent any investigation that is carried out both by Euro-Funding itself and, where appropriate, by judges, prosecutors, State security forces and bodies and/or competent bodies.

All Euro-Funding agreements must be reviewed and approved, prior to their signing, by the Legal Manager or by the person delegated by him.

The filing, custody and conservation of the contracts and the rest of the contractual documentation is carried out following the indications and instructions of the Legal Manager or the person to whom he delegates. Similarly, the filing, custody and conservation of financial and accounting information is carried out following the indications and instructions of the Financial Director or whoever he delegates.

The contractual documentation and the financial and accounting information of Euro-Funding is only destroyed with the approval and in writing (letter, email or fax) of the Director of the Legal Department, in the case of contractual documentation, or of the Financial Director of Euro-Funding, in the case of financial and accounting information.

3.5.3 Confidential information.

Confidential information (hereinafter, "Confidential Information") refers to any data and information of Euro-Funding, its suppliers, clients, or third parties, including all corporate information, information subject to copyright, patents, techniques, models, inventions, know-how, processes, algorithms, programs, executables, research, designs, design details, legal, tax and financial information, personal data, lists of clients, suppliers, investors, employees, compensation policies, business and contractual relationships, business forecasts, and marketing plans.

Therefore, all information known, used, handled, or received in the performance of our duties is Confidential Information owned by Euro-Funding, who determines its use.

3.5.4 **Obligation to protect the confidentiality of information.**

The Person Subjects are obliged, during their relationship with Euro-Funding and after it, indefinitely, not to disclose the Confidential Information to which they have accessed due to the relationship maintained, nor to use it for purposes other than the same, as well as, where appropriate, to contractually impose the same obligation on its staff and/or subcontractors.

The signing of confidentiality agreements and clauses is mandatory when contracting with third parties on behalf of Euro-Funding companies.

3.5.5 **Privacy policy and data protection**

Any processing of personal data by Euro-Funding and/or the Persons Subject is carried out with full respect for the privacy of the data holders, especially about honour and personal and family privacy and in strict compliance with the national and European regulations on the processing of personal data.

The processing of personal data is adequate, pertinent and not excessive in relation to the scope and specific, explicit and legitimate purposes for which it was obtained; the data is stored in such a way that its unauthorized access and transfer is prevented; sensitive data such as those related to ideology, beliefs and health are especially protected; and the exercise by the interested parties before Euro-Funding of the rights recognized by the legislation on protection of personal data is provided.

3.5.6 **Use of Artificial Intelligence (AI)**

Euro-Funding always seeks innovation in all areas of activity, while using this technology (AI) based on inalienable principles:

- **Transparency:** We are clear about how, when, and why we use AI.
- **Fairness:** We avoid biases that discriminate for any reason.
- **Privacy:** We protect the privacy and security of all data.
- **Responsibility:** We take responsibility for AI-supported decisions and encourage the review of the information obtained.
- **Sustainability:** We use this technology in an environmentally friendly way, aligned with our sustainability goals.

Employees may receive training on these principles to promote communication and report concerns related to AI. We may conduct audits to ensure compliance.

As a result of the above, EURO-FUNDING has implemented, within its functions, the Guidelines for the responsible use of generative AI in research developed by the European Research Area Forum and disseminated by the European Commission. To this end, EURO-FUNDING adheres to the European Council Code of Conduct for consultants offering services to organizations applying for calls from the European Innovation Council.

3.5.7 **Responsible Management**

EURO-FUNDING aims for the highest ethical and social responsibility standards, reflecting this commitment in excellence, sustainability, safety, environmental management, energy efficiency, and information security. This is demonstrated by compliance with ISO 9001 (Quality Management), ISO 14001 (Environmental Management), ISO 27001 (Information Security), ISO 45001 (Occupational Health and Safety Management), and ISO 50001 (Energy Management), thus contributing to comprehensive, feasible, and secure development.

Euro-Funding is committed to improving its operations by implementing technical standards that contribute to this goal and complying with current legislation. This commitment extends into the future with the adoption of other voluntary standards that help optimize processes, as well as striving for excellence and sustainable development.

4 PENALTY SYSTEM

Breaching the Code and standards has consequences

Non-compliance with the Code of Ethics by a Person Subject entails reparation for the damages that such non-compliance causes to Euro-Funding. It may imply the conclusion of the contractual relationship with the company or, in the event of an employment relationship, the adoption of disciplinary measures, including dismissal.

Non-compliance with the Code of Ethics is considered, among others:

- Default on any of the duties or prohibitions imposed by the Code.
- Persuade third parties to breach the Code or applicable laws.
- Cover up who fail to comply with the precepts of the Code or laws.
- Do not cooperate in the investigation started by Euro-Funding.
- Carry out reprisals against Person Subjects who have disclosed or reported a possible breach of the law and/or this Code.
- Break the Euro-Funding's rules.

5 FRAUD PREVENTION: DIRECT CHANNEL

We must collaborate so that irregularities, regulatory breaches, and crimes do not go unpunished

5.1 Application of an internal information channel

Euro-Funding has a confidential mechanism for filing complaints and internal inquiries (hereinafter, the "Direct Channel"), which can be accessed online through the procedure established for this purpose. Any possible transgression must be reported to canaldirecto@euro-funding.com.

The Direct Channel has the following targets:

- Communicate any doubt about the interpretation or application that arises in relation to the Code of Ethics, its development regulations or applicable legislation.
- Awareness to Persons Subject about our objective of "Zero Tolerance" with irregularities.
- Serve as a system against crimes, infractions of the law and/or the Code that can be committed in Euro-Funding or to its damage.
- Allow Euro-Funding to know the commission of any possible violation of the Code and/or the law within or to the detriment of it.
- Prevent Euro-Funding from being sentenced to fines, penalties, or sanctions.

Persons Subject have the duty to know the existence and operation of the Direct Channel and, if necessary, make use of it to inform the commission of any irregularity of which they may become aware.

It's not allowed to harass, threaten, coerce, discriminate or reprisal anyone who reports in good faith an act or conduct contrary to the law, this Code, or any other Euro-Funding document.

Reports made in bad faith, knowingly false or with the purpose of harming another person are subject to disciplinary sanction, without prejudice to other responsibilities.

Through an internal procedure, the use of the Direct Channel, the investigation procedure and the sanctioning regime are regulated.

6 ENTRY INTO FORCE

This Ethical Code is in force from the day of its approval by the Euro-Funding Management and remains in force as long as its modification and/or annulment is not approved.

This Code is periodically reviewed and updated by the Management and considers the suggestions and proposals of the employees and the commitments acquired by Euro-Funding.

7 TRAINING AND DIFFUSION

The implementation of the control measures included in this Code go with their diffusion and explanation to Euro-Funding employees, stressing the importance of compliance and preventing illegal activities.

ANNEX I.- UNITED NATIONS GLOBAL COMPACT

Euro-Funding is a signatory to the United Nations Global Compact that establishes the following Universal Principles in the fields of Human Rights, labour standards, the environment and anti-corruption:

Human rights:

We support and respect the protection of internationally recognized Human Rights, within our circle of influence.

We make sure not to be complicit or breach Human Rights.

Labour rights:

We support the freedom of association and the effective recognition of the right to collective bargaining, the removal of all forms of forced or coerced labour, the elimination of child labour and the ending of discriminatory practices in employment and occupation.

Environment:

We support a preventative approach in relation to environmental challenges, with a precautionary approach.

We encourage initiatives that promote greater environmental responsibility.

We favour the development and diffusion of environmentally responsible technologies.

Bribery:

We work against fraud in all its forms, including blackmail, bribery, and corruption.

Legal Department



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Your P&L is our DNA