



INFORMATION DOCUMENT

# Code of Ethics I Ø

Code of Conduct applied to Uniones Arpol, S.A.



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## 1. Scope of application of the Code of Conduct

This Code of Conduct (hereinafter, the "**Code**") contains the catalogue of rules of conduct that must govern the actions of all "**Subject Persons**" or "**Staff**" employed by **UNIONES ARPOL S.A.** (hereinafter "**UNIONES ARPOL**" or the "**Company**") and constitutes a principal element of the Compliance Program of **UNIONES ARPOL**.

This Code applies to the Board of Directors of the Company, to the executives and attorneys-in-fact and to all employees of UNIONES ARPOL, as well as to external collaborators and interns, if any. All such persons are hereinafter referred to as "**Subject Persons**".

In certain specific matters that require detailed regulation, the rules of this Code are supplemented by those contained in other **UNIONES ARPOL** codes and manuals. The industry codes and manuals include the Regulatory Compliance Manual or Compliance Manual, the GDPR Data Protection Manual, the Occupational Risk Prevention Manual, the Internal Operating Protocols, etc. (hereinafter referred to as the "**Compliance Manuals**"), as well as the notes and circulars that expand on specific points of these codes and manuals.

Persons subject to the Code have the obligation to be aware of and comply with this Code of Ethical Conduct and to collaborate to facilitate its implementation in **UNIONES ARPOL**, including communication to the Compliance Officer alerting of any infringement that comes to their knowledge.

With the application of the Code, it is intended that the people who perform their activities within **UNIONES ARPOL** demonstrate integrity and professional behaviour at all times and contribute to the good environment and commitment of **UNIONES ARPOL**, denouncing those behaviours that may damage its image and/or reputation.

## 2. Code of Conduct General Principles

The Code of Conduct General Principles, together with the Company's Compliance Manuals and the professional ethics of its members constitute **UNIONES ARPOL's** pillars of action. All actions of Subject Persons must be guided by these guidelines and principles.

**UNIONES ARPOL**, in the field of internal relations, has the following principles:

### 2.1 Ethical principles

- **Respect for people**

All Persons subject to the Code shall at all times promote relationships based on respect for others and reciprocal collaboration. **UNIONES ARPOL** assumes the commitment to ensure that professional relations within the Company are free from any type of violence and/or harassment, with the consequent prohibition of any type of discrimination, intimidation and offensive or

improper conduct, lack of respect or any type of physical or verbal aggression that may violate the fundamental rights of individuals.

- **Principle of equality and non-discrimination**

**UNIONES ARPOL**'s basic principle is to maintain a work environment that respects the dignity of all people and avoids any type of conduct that violates fundamental rights protected by law, international conventions and the general legal system.

**UNIONES ARPOL** expresses its firm commitment to the principle of promoting equal opportunities in access to employment and professional promotion, avoiding at all times situations of discrimination or inequality based on gender, race, social or sexual status, marital status, religion, political or union affiliation or any other personal or social circumstance.

- **Prevention of occupational hazards**

Subject Persons shall at all times respect the applicable preventive measures regarding occupational health and safety. To this end, they have the obligation to be aware of and use the resources that **UNIONES ARPOL** makes available to them in terms of safety and prevention of occupational hazards and, where appropriate, to ensure that their team members perform their activities in safe conditions.

- **Work/life balance**

Subject Persons shall promote a work environment compatible with personal development, facilitating, among the people in their teams, access to measures that facilitate the reconciliation of professional performance at **UNIONES ARPOL** with the needs of their personal and family life, with the aim of improving the quality of life of the persons subject and their families.

- **Environmental protection**

Subject Persons, within the scope of their responsibilities, must comply at all times with the legal requirements and internal procedures established by **UNIONES ARPOL**, in order to reduce or avoid, as far as possible, the environmental impact of their activities and also to prevent the company from incurring, through its activities, in any of the offences described in the Regulatory Compliance Plan.

## 2.2 General rules of conduct

- **Regulatory compliance**

Subject Persons shall conduct themselves professionally in an upright, impartial and honest manner and shall refrain from engaging in illegal activities.

Subject Persons shall comply with the general provisions (laws, regulations, and circulars of the supervisory bodies) as well as Compliance Manuals and internal procedures of **UNIONES ARPOL** applicable to them.

Any Subject Person who is sued, investigated or accused in legal proceedings that may affect their activity in **UNIONES ARPOL** or that have their origin therein, must inform, as soon as possible, the General Manager of the Company.

Likewise, the General Manager of **UNIONES ARPOL** shall be informed of the existence of any administrative proceedings affecting them, whether as allegedly responsible, witness or otherwise, which are processed by the authorities or bodies supervising the activity of **UNIONES ARPOL**.

- **Concurrent activities**

Subject Persons with an employment contract (employees) must give priority to the exercise of their duties in **UNIONES ARPOL** and may not provide professional services to other entities or competing companies, paid or unpaid, whatever the relationship on which they are based, unless expressly authorised by the General Manager, following a favourable report from the Compliance Officer.

Subject Persons with an employment contract (employees) who carry out other professional activity must inform the General Manager of this circumstance as soon as it may arise.

- **Professionalism and Responsibility**

Subject Persons shall use their technical and professional capacity and due diligence in the performance of their activity in the Company.

In particular:

- They shall be responsible for achieving the technical and professional training necessary for the performance of their duties, making responsible use of the resources made available to them by **UNIONES ARPOL**.
- They shall respect internal procedures, account for operations and keep files and records required in their duties, in an accurate and rigorous manner.
- They shall comply with the rules and measures established in safety and hygiene matters, with the objective of preventing occupational hazards.
- Economic and financial information shall give a true and fair view of the economic, financial and asset reality of the company, in accordance with generally accepted accounting principles and applicable international financial reporting standards.
- They shall take care of the assets to which they have access, using them to the extent necessary for the performance of their duties and refraining from any unauthorised use or encumbrance.
- They shall make correct and appropriate use of the means made available to them by **UNIONES ARPOL**.
- They shall allocate expenditures strictly in accordance with requirements.



- They shall use computer equipment respecting the computer security measures implemented by **UNIONES ARPOL**.
- They shall respect the intellectual property rights of **UNIONES ARPOL**.
- They shall not use the image, name, brand or logo of **UNIONES ARPOL** outside the scope of their professional activity.

### 3. Behavioural guidelines in specific situations

- **Conflicts of interest**

Subject Persons shall always act in such a way that their private interests, those of their relatives or other persons related to them, do not take precedence over those of **UNIONES ARPOL**.

These guidelines for conduct will be applied both in their relationship with **UNIONES ARPOL**, as well as that any other third party related to the same.

Subject Persons shall identify and report both potential and actual conflict of interest situations, including those arising from kinship or other relationships.

They shall refrain from participating (either in decision-making or in representation of **UNIONES ARPOL**) in transactions of any kind in which they have an interest of their own or of a related person.

Consequently, and without prejudice to the aforementioned general rule:

- They may not acquire or transfer, either directly or through related persons, assets or property belonging to **UNIONES ARPOL**.
- They shall not provide special treatment or working conditions based on personal or family relationships.

Inside Information:

Subject Persons in possession of inside information shall not carry out transactions on their own account or on the account of others, directly or indirectly, on the securities or instruments to which it relates. Nor shall they promote, support or recommend that others do so.

Inside information is considered to be any information of a specific nature that has not been made public and which, if made public, could have a significant influence on the price in a market or organised trading system.

- **Duty of Confidentiality**

Subject Persons must maintain professional secrecy with respect to any data or information they may learn as a consequence of the exercise of their professional activity, whether they come from

or refer to **UNIONES ARPOL**, its customers and suppliers, other Subject Persons or any other third party.

Consequently, and without prejudice to the foregoing:

- They shall use such data or information exclusively for the performance of their professional activity. They may only provide it to other professionals who need to know it for the same purpose and shall refrain from using it for their own benefit.

Although it is possible to have access to certain information, this access will only be justified when the professional interest referred to above is present.

- The data and information related to financial statements and, in general, to any activity of the clients will be treated with absolute confidentiality and in compliance with the limits imposed by the laws in force at any given time.

Consequently, in order to transfer any information to third parties, beyond these limits, it will be necessary to have the prior express authorisation of the client, except in cases where a legal requirement or a judicial or administrative authority request it.

- The information, which, for any reason or circumstance, may become known, relating to other Subject Persons, including, where appropriate, information relating to any personal or family information, remuneration or health-related information, in addition to being subject to professional secrecy - as it is of a personal nature - is sensitive information and, therefore, specially protected by the GDPR and applicable legislation.

Subject Persons must comply with the obligation of secrecy even after the end of their relationship with **UNIONES ARPOL**.

- **Supplier relations**

Supplier selection processes must be characterised by the search for competitiveness and quality, guaranteeing equal opportunities for all suppliers.

Subject Persons, and especially those involved in decisions on the contracting of supplies or services or in the setting of their economic conditions, shall avoid any kind of interference that could affect their impartiality or objectivity in this respect.

Exclusive relationships should be avoided whenever possible.

The contracting of external supplies and services must be carried out through transparent procedures and in accordance with criteria of advertising and competition, avoiding forms of dependence.

The acceptance by the Subject Persons of any kind of personal benefit, gifts - unless their value does not exceed **ONE HUNDRED AND FIFTY EUROS (€150.00)** as indicated in the

"Acceptance of gifts" section -, invitations, favours or other compensation from suppliers is prohibited.

Attendance of social events, invitations to professional lunches, trade fairs, seminars and other types of training activities, which have been previously authorised by the superior, shall not be considered personal benefits.

Likewise, the receipt of any kind of remuneration or financing from suppliers is prohibited, as well as, in general, the acceptance of any kind of outside remuneration for services derived from the employee's own activity.

- **Relationships with other subjects, professionals and employees**

It is forbidden for all Subject Persons to request from any other Subject Person of **UNIONES ARPOL**, whether professional or employee, the performance of activities that are private or that entail personal benefit, unrelated to the activity of **UNIONES ARPOL**.

- **Personal Data Protection**

Subject Persons are obliged to respect the right to data protection, the right to respect and the right to personal privacy of all persons to whose data they have access due to the performance of their activities within **UNIONES ARPOL**.

This must be applied to any information concerning a person: identifying, family, economic, audiovisual or any other type of information that allows identification and to which the person has access throughout the provision of the services offered.

Personal data will be processed in accordance with the principles established in the data protection regulations, so that:

- Only the data necessary for professional or training activity will be collected. Such collection will always be accompanied by information on the processing, thus fulfilling our duty to inform in the manner required depending on both the origin and the means by which the personal data were obtained.

This ensures that the treatment of all types of personal data is always in accordance with what has been previously agreed between UNIONES ARPOL and the persons who choose to provide their information.

- The collection, computer or paper processing and subsequent use will be carried out in such a way as to guarantee security, truthfulness and accuracy, the right to privacy of individuals and compliance with the obligations resulting from the applicable regulations.
- Only Subject Persons authorised to do so by virtue of their duties shall have access to such data to the extent necessary for the exercise of those duties.

- The duty of secrecy and confidentiality will be guaranteed at all times with respect to personal information and it will not be provided to third parties other than the owner of the data.
- The rights of access, rectification or deletion of personal data, the right to data portability, the right to object and the right not to be subject to automated individualised decisions shall be fully observed and respected at all times.
- Both the IT systems and the internal management procedures have been adapted to the requirements of the new Data Protection regulations:
  - Updating of equipment and computer systems in order to ensure optimal technical, organisational and security measures in relation to the categories of data we process and the processing we carry out.
  - Creation of new protocols for the attention to the rights of individuals, fully in line with the security they deserve, so as to ensure that the requests received comply with all the necessary requirements of form and content, as well as to respond in due time and form to the request that has been submitted.
  - Setting up of systems to react to possible security breaches, both computerised and manual, with subsequent compliance, if necessary, with the obligation to notify both the competent Supervisory Authority and the interested parties who are owners of such data.

- **Money Laundering Prevention**

Subject Persons shall strictly comply with the rules contained in Law 10/2010 of 28 April on Money Laundering and the Financing of Terrorism, and shall observe particular diligence in complying with the following rules:

- They shall confirm and document the true identity of the clients with whom they maintain any type of business relationship, as well as any additional information about the client, always in accordance with the provisions of the applicable regulations for the prevention of money laundering and the financing of terrorism.
- They shall require documents evidencing the powers of attorney of the persons authorising transactions on behalf of the client.
- They shall identify the natural person or persons who ultimately own or control, directly or indirectly, a percentage of more than 25% of the shares, rights or assets of legal persons or other legal entities, except those listed on a regulated market.
- Clients listed as prohibited in the Manual for the Prevention of Money Laundering and Terrorist Financing will not be accepted.
- They shall comply with the requirements established in the legislation for obtaining documents and the registration and communication of operations.

- They shall immediately report suspicious activities to the competent internal prevention body.
- They shall refrain from providing any internal or external information on customers or transactions to which any report of suspicious activity relates.
- **Acceptance of gifts**

Subject Persons are prohibited from accepting any type of income or commissions for transactions carried out by the Company, or otherwise taking advantage of the position they hold in the Company for their own benefit.

Thus, any invitation, gift or favour which by its nature, frequency, characteristics or circumstances could be interpreted as having been made with the intention of influencing the objectivity of the recipient shall be refused and brought to the attention of the General Manager.

Consequently, no Subject Person may accept gifts, invitations, favours or any other type of compensation related to their professional activity in the Company from customers, suppliers, intermediaries, counterparties or any other third party.

Not included in this limitation are:

- Promotional and advertising material of little value or any other gift or favour whose value does not exceed **ONE HUNDRED AND FIFTY EUROS (€150,00)**.
- Normal invitations that do not exceed the limits considered reasonable in normal social customs.
- Occasional gifts for specific and exceptional causes, provided they are not in cash and are within reasonable limits.

In all cases, Subject Persons shall deliver to the General Manager any gift, invitation or attention whose value exceeds **ONE HUNDRED AND FIFTY EUROS (150.00 €)**.

Gifts, invitations or favours received from customers or suppliers, which exceed the threshold of €150.00, will be raffled every six months (or when appropriate) among all subject persons.

In all cases, Subject Persons shall deliver to the General Manager any gift, invitation or attention whose value exceeds **ONE HUNDRED AND FIFTY EUROS (150.00 €)**.

- **Use of assets**

Subject Persons shall ensure that the assets of the Company are not impaired. To this end, they shall comply with the following rules for their use:

- They shall safeguard and care for the assets in their possession or to which they have access and use them in a manner appropriate to the purpose for which they have been entrusted.

- They shall not carry out any act of disposition or encumbrance on the same without the appropriate authorisation.
- They shall ensure that expenditure is incurred strictly in accordance with the needs of their professional activity, and that it allows for a high degree of efficiency in the use of available resources.
- **Use of Information and Communication Technology**

Subject Persons shall at all times strictly comply with the rules established by **UNIONES ARPOL** in terms of computer security and in particular:

- They shall provide special protection for computer systems, taking all security measures to protect them.
- They shall respect the specific rules governing the use of electronic mail, internet access or other similar options made available to them, and under no circumstances may these means be used inappropriately.

The use of the equipment, systems and software that **UNIONES ARPOL** makes available to employees for the conduct of their work, including the ability to access and operate on the internet, must be in accordance with security and efficiency criteria, excluding any abuse, action or computer operation contrary to the instructions or needs of **UNIONES ARPOL**.

- Subject Persons shall not use **UNIONES ARPOL**'s means of communication, such as forums, web pages or others, to express content, ideas or opinions, or to disseminate political or other content unrelated to **UNIONES ARPOL**'s activity, respecting the neutrality of the company.
- Nor shall they use private or corporate email or other similar tools on company property or for private or other purposes that are not for the benefit of the company itself.
- Subject Persons must not install or use on computer equipment made available to them by the Company, programmes or applications whose use is illegal, or which may damage the systems or harm the image or interests of the Company, customers or third parties.
- Subject Persons must not use the computer facilities made available by **UNIONES ARPOL** for illicit purposes or for any other purpose of their own or another, which may damage the image or interests of **UNIONES ARPOL**, clients or third parties, affect the service and dedication of the employee, or impair the operation of the Company's computer resources.
- The use of the aforementioned facilities may be controlled by **UNIONES ARPOL**, respecting staff privacy in accordance with the law, as long as it involves the company's computer systems, whether the use occurs within the company or via remote work or via any other access.

- Each Person Subject shall be responsible for locking and disconnecting their terminal when absent from the workstation. In case of absence or termination of the employment relationship, **UNIONES ARPOL** may cancel the employee's access to the company's computer systems.
- The information stored or recorded by the employee on servers, media or systems owned by **UNIONES ARPOL**, may be subject to access justified by **UNIONES ARPOL**.

- **Intellectual and industrial property rights**

Subject persons shall not use the image, name, trademarks or logo of **UNIONES ARPOL**, except for during the proper conduct of their professional activity therein.

Subject Persons shall also respect the intellectual and industrial property rights held by third parties outside **UNIONES ARPOL**. In particular, the use in the Company of any content belonging to third parties shall require the prior authorisation of such third parties.

- **Corporate image and reputation**

The Company considers its corporate image and reputation as a very valuable asset to preserve the trust of its customers, employees, suppliers, authorities and the Company in general.

Persons subject to the Code shall take the utmost care to preserve the image and reputation of **UNIONES ARPOL** in all their professional actions, also respecting the neutrality of the company in all kinds of issues that involve expressing content, ideas or opinions or reporting political or other content, unrelated to the activity of **UNIONES ARPOL**.

- **Tax obligations**

Subject Persons shall avoid all practices that entail the unlawful avoidance of tax payment to the detriment of the Public Treasury or the General Treasury of the Social Security.

- **Accounting obligations**

The Company's financial information shall be prepared reliably and accurately, ensuring that:

- Transactions, facts and other events reflected in the financial information actually exist and have been recorded at the appropriate time.
- The information reflects all transactions, facts and other events in which the company is an affected party.
- Transactions, facts and other events are recorded and valued in accordance with applicable standards.
- Transactions, facts and other events are classified, presented and disclosed in the financial information in accordance with applicable standards.

- Financial information reflects, as of the corresponding date, the rights and obligations through the corresponding assets and liabilities, in accordance with applicable regulations.

## 4. External relations

- **Relationship with authorities**

The relationship between the Subject Persons and the representatives of the authorities shall be governed by the principles of respect and collaboration within the framework of their duties.

- **Political or associative activities**

The link, membership or collaboration with political parties or other entities, institutions or associations with public purposes or that exceed those of **UNIONES ARPOL**, as well as contributions or services to them, in the event that they are made, must be made in such a way that it is clear and unequivocal that they are made exclusively in a personal capacity, avoiding any possible interpretation of link or association with **UNIONES ARPOL**.

In all cases, Subject Persons who wish to accept any public office must inform the General Manager whenever the performance of the public office in question may directly or indirectly affect their activity at **UNIONES ARPOL**.

## 5. Specific rules to prevent corrupt conduct

- **Compliance with the law**

Respect for legality is a priority in the culture of **UNIONES ARPOL**, which entails the obligation, without exception, to comply with the law and with internal policies and regulations.

In particular **UNIONES ARPOL**:

- Rejects any conduct, practice or form of corruption, expressly prohibiting any conduct of this nature.
- All professionals must behave ethically in all their actions and avoid any conduct that, even if not in violation of the law, may damage the reputation of UNIONES ARPOL and negatively affect its interests and/or its public image.

- **Guidelines to avoid engaging in corrupt conduct by public officials**

It is absolutely forbidden to give, promise or offer any kind of payment, commission, gift or reward to any authorities, public officials or employees or managers of public companies or bodies, whether in Spain or abroad.

In the event that **UNIONES ARPOL** uses agents, intermediaries or advisors to carry out transactions or contracts involving a public authority, public body or public company, whether of Spanish or foreign nationality, the following measures shall be adopted:

- Wherever possible, entities of recognised standing in the market or sector concerned shall be used as agents, intermediaries or advisors.
- Due diligence shall be taken in the selection of the persons involved and their collaborators, to ensure that they are trustworthy and do not carry out activities that may involve risks, economic damage or compromise the reputation and good image of **UNIONES ARPOL**.

In general, particular care should be taken in cases where the remuneration of the agent, intermediary or adviser is linked to the success of the transaction or contract.

Subject Persons must reject and inform the Governing Body of any request by authorities, public officials, employees or managers of companies or public bodies, both in Spain and abroad, for payments, commissions, gifts or remuneration of the kind mentioned above in this section.

- **Guidelines to avoid engaging in corrupt conduct by private individuals**

It is prohibited to give, promise or offer any kind of payment, commission, gift or remuneration to any employees, officers or directors of other companies to favour UNIONES ARPOL over other competitors.

## 6. Application of the Code of Conduct

- **Compliance**

The Board of Directors of the Company shall ensure compliance with the Code of Conduct in their respective areas.

Supervision of compliance with the Code is the responsibility of the Compliance Officer as defined in the Criminal Risk Prevention Manual. The Compliance Officer will include in their review the necessary checks to ensure compliance with the provisions of the Code of Conduct, will make the necessary proposals for its improvement, and will periodically report to the Board of Directors on its application.

The Board of Directors shall approve this Code and any other internal regulations or codes of conduct of the Group.

**UNIONES ARPOL** has a Whistleblowing Channel that allows Code Subjects to confidentially inform the Compliance Officer of alleged breaches of the Code of Conduct, as well as the possible commission of irregularities of a financial and/or accounting nature or the carrying out of any other irregular or fraudulent activities within the organisation.

The Compliance Officer is responsible for making the Code of Conduct available to the Persons subject to the Code of Conduct, ensuring adequate knowledge thereof and interpreting and generally attending to any queries raised by the Persons subject to the Code of Conduct.

- **Non-compliance**

The behaviour of all Subject Persons must comply with this Code; they shall maintain a cooperative and responsible attitude in identifying situations of actual or potential non-compliance with the ethical principles and rules of conduct contained in this Code and shall report them to the bodies responsible for resolving them.

Failure to comply with the Code may give rise to the implementation of the corrective measures and penalties established in the labour regulations in force, without prejudice to the administrative or criminal sanctions that may be applicable, as the case may be.

Premià de Dalt on 7 February 2023

