

ETHICS POLICY

CUPA-GROUP
Since 1892



This policy is intended to establish the principles and basic commitments that are expected and must be required from the companies in Cupa Group, from all their employees, directors and government organs; and provides a common integrity framework for all of them in the conduct of their professional activities and their relationships with stakeholders.

All Cupa Group companies shall comply with this policy without prejudice to it being supplemented with other documents that do not contravene the basic lines established here.

Compliance is obligatory for Cupa Group employees, directors, government organs and collaborators, whatever their location, hierarchical position in the organizational chart or the type of contractual relationship uniting them to the company, as well as for the different forms of administrative organs that manage the company and its members.

Principles

- Professional growth and development of its employees to strengthen their skills.
- A culture of recognition of achievements and equal opportunities among members of the group.
- Commitment to not discriminate when choosing and assessing its employees.
- Always use legal forms of labor recruitment.
- Correct human resources management, committing to internal promotion programs.
- Commitment to diversity and integration of human resources, guaranteeing fairness.
- Promoting a work environment where trust and respect reign and a secure work atmosphere.
- Commitment to strict compliance with current legislation, and with internal codes of conduct and the Group's White Paper.
- Maintain a high standard of information security with no transfer to third parties, with very limited exceptions.
- Dedication to the job from employees who should aspire always to perform at their highest level.
- Generate a culture of collaboration and cooperation with other employees both in the transfer of information and compliance with the rules.

- Have directors who are references for their respective teams, who maintain good communication with general management transmitting information that is true, real and fair.
- Market the company's products and services responsibly
- Respect agreements entered into with customers and suppliers.
- Transparent handling of complaints, acting according to an objective procedure.
- Protect third party data and offer appropriate channels for complaint.
- Prohibition on offering and accepting gifts with more than a symbolic value.



Javier Fernández
CEO Cupa Group
30th June 2021