

ETHICS POLICY

CUPAGROUP
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. Accordingly, office employees of the Group shall (re)certify their adherence to this Ethics Policy as well as to the Code of Ethics on an annual basis.

CUPA GROUP, therefore, promotes the following 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.

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- 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.
 - **Selection of suppliers that respect Human Rights**, maintaining criteria of objectivity in **pre-selection**.
 - Respect for the environment through **awareness of the environment, responsible use of resources and commitment to innovation**. All of this is always accompanied by appropriate **training for employees**.
 - No direct or indirect **participation** in political campaigns or events or those of its foundations.
 - The group has created a **foundation** for the economic development of particularly disadvantaged rural areas.
 - Commitment to transparency and security in complaints through the group's **whistleblowing channel**. Confidential and anonymous, and ready to receive reports, complaints, claims and suggestions from any party related to **CUPA GROUP**.



Javier Fernández
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