

**CODE OF ETHICS AND CONDUCT**



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#### LETTER FROM THE PRESIDENT

## Dámaso Quintana

### **Executive President of Cunext Group**

Ensuring that Cunext Group represents excellence in quality worldwide, in all aspects, is a cornerstone of our strategy. Excellence in management includes diligent, loyal and ethical conduct on the part of each of us, from the members of the Board of Directors and the Executive Management Team to each individual employee. This document contains the values and principles that govern our activities at the Cunext Group and serves as a guide to enable everyone to understand and adhere to them, insofar as they constitute the foundations of all our activities at the Cunext Group.

Acting fairly, ethically and with full respect for the rules and our values is essential to our business because it fosters one of our greatest assets: our customers and their trust.

Please take the time to read this Company Code of Ethics and Conduct to ensure that all our actions are in line with the behaviour expected of the Cunext Group.





## **Principles and obligations**

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This Code of Ethics and Conduct governs the professional actions and relations of employees, officers and directors with customers and potential customers, colleagues, competitors, public administration bodies, the media and society in general. It also provides guidance on how to communicate possible conflicts, doubts or infringements.

This code is not intended to encompass all situations that may arise, but to establish a frame of reference by which all activities should be governed.

The honesty, integrity and judgement of these professionals is critical to the reputation and success of the organisation.

The Cunext Group values its **corporate culture and its Integrated Management System** as a key asset. They define the way we do things within the organisation.

The Group is committed to occupational health and safety, the environment and quality in all its internal and external activities. This affects all members of the organisation in their daily activities. To that end, there are concrete rules and they are the consequence of doing things with knowledge, common sense, order and responsibility.

Actions carried out in the scope of the responsibilities and functions entrusted to an employee must be governed by **professional rigour**, strict compliance with the applicable regulations and the principles set out in this Code.

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## **Legal Compliance**

The Group is firmly committed to complying with current Spanish and international regulations when carrying out its business activities, following a policy of zero tolerance towards non-compliant conduct. Likewise, the organisation will collaborate with public administrations wherever necessary.

## **Health and Safety in the Workplace**

Occupational health and safety is a priority for the Group. Management shall adopt all the preventive measures established by law and all members of the Cunext Group shall comply with health and safety regulations in order to avoid and minimise occupational hazards.

## **Non-discrimination**

No member of the Cunext Group shall be discriminated against on the grounds of origin, race, sex, religion, outlook or any other personal or social condition or circumstance.

## **Crime Prevention**

Management and senior management shall provide an appropriate control environment in which to assess and manage the Group's criminal risks. They will monitor the prevention of criminal offences through a compliance management system.

## **Protection of the environment**

All employees in the Group must perform their duties in compliance with environmental regulations and ensure that our business activities have as little impact as possible.

## **Financial Information**

The members of the organisation must follow accounting rules and principles, report the financial position with fairness and integrity and have adequate internal processes and controls. Accounting and financial reporting must comply with applicable listing, legal and regulatory requirements.

## **Conflicts of Interest**

Members of the organisation should act with loyalty, honesty and professionalism, making business decisions based on the best interests of the organisation and not personal considerations or relationships. They must avoid situations where personal interests may conflict with the interests of the Group, or appear to do so.

## **Funding of Political Parties**

The law prohibits companies from funding political parties. Therefore, Cunext Group funds may not be used to make any direct or indirect financial contribution to any political party or entities related to them.

## **Gifts and Bribes**

Members of the Group should avoid bribery by offering or accepting of gifts, benefits, reimbursements or compensation in representational activities that could impair (or appear to impair) professional judgement in the performance of their respective work or in the discharge of their duties to the Group or third parties.

### **Intellectual Property**

Intellectual property created by each employee as a result of their professional responsibilities is transferred and ceded to the CUNEXT GROUP by law and/or as a result of their employment contract or another agreement, aside from the exceptions stipulated in international conventions, local legislation or personal agreements.

### **Confidentiality**

Members of the organisation must not access, use or disseminate unauthorised information. This may cause damage to the CUNEXT GROUP or to third parties, therefore you are not permitted to access, use or disclose any information unless you have been properly authorised to do so.

### **Protection of Personal Data**

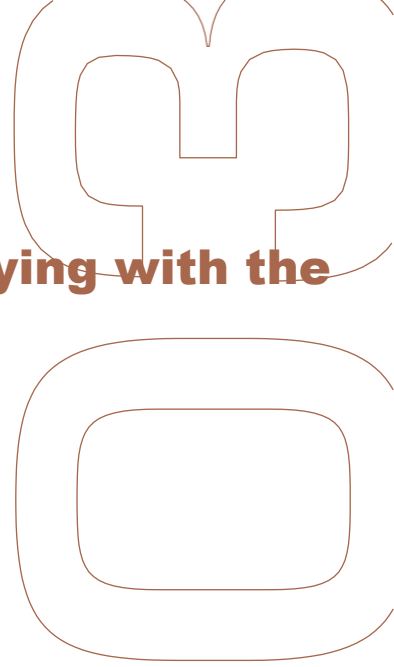
We are committed to using employee, customer, supplier and other stakeholder data appropriately, respecting their right to privacy. Professionals whose activities require them to handle such confidential data shall use them in accordance with the legislation on the protection of personal data.

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# Applying and Complying with the Code



### **Code Compliance Officer**

The individual responsible for ensuring that the Code is followed, distributed and kept up to date is the Compliance Officer.

Any queries or requests for information regarding this Code should be addressed to this individual through the Code of Ethics.

All Board Members, Executives and employees at Cunext to whom this Code is applicable, as well as any professionals who join the company, expressly accept its full content. Cunext will communicate and disseminate the Code of Ethics and Conduct to all necessary recipients.

### **Ethical Channel**

The company analyses and responds to queries and information received as a result of the application of and compliance with the Code of Ethics and Conduct. Anyone who suspects that an illegal act has been committed may report it through the established Ethics Channel.

In this regard, should employees need to report any potential breaches or concerns regarding this Code or any other internal policies, they may contact the Compliance Officer by e-mail at [compliance@cunext.com](mailto:compliance@cunext.com) or by filling in the web form for reporting breaches via the following link: <https://cunext.com/sostenibilidad/canal-de-denuncias/>

### **Sanctioning Regime**

Failure to comply with this Code may result in a sanction in accordance with current employment legislation, including termination of the contractual relationship, without prejudice to any other administrative or criminal responsibilities that may also apply in the specific case.

In any event, the sanctioning procedure shall be governed by strict respect for fundamental rights and guarantees inherent to any sanctioning procedure.

### **Validity and Updates**

The Code of Ethics and Conduct was approved by the Cunext Group Board of Directors in January 2018, coming into effect from the moment of its approval and remaining in full force and effect until such time as it is amended.

Any amendments made to the Code of Ethics and Conduct shall be approved by the Board of Directors, at the proposal of the Compliance Officer and following a report from the Audit Committee, and shall be applicable from the day following their communication to all persons affected by them.



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