



English version



Code of Conduct

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The Code of Conduct is an essential document that reflects ADER's commitment to legality and ethical behavior and integrity, which means that the company expects all employees to act with integrity and in accordance with the spirit and letter of the law.

The Code of Conduct contains a series of Principles and Rules of Conduct that we must observe during our work and which, in essence, is no more than a summary of rules that are already imposed on us by the various laws in force and which will help all employees to know their legal obligations and, at the same time, constitutes a practical guide as to how they should act at work in accordance with the law.

In general you will find that they are simple rules and principles, full of common sense, and difficult to disagree with. However, it is essential that there is no doubt about their content and application, so please be

critical, question the Code and ask as many questions and seek as much clarification as you feel is necessary to fully understand it.

Always remember that the Code of Conduct cannot cover all situations in working life, so it is very important that, in any situation where you are in doubt about how to act, whether with respect to a rule or a behavior, you ask your manager, the Human Resources department or the Compliance Officer.

Finally, the Code of Conduct in no way modifies your employment relationship with the company. Neither does it grant or take away any right or privilege, nor does it add any obligation or prohibition that is not already established by the laws in force, the applicable collective bargaining agreement or your employment contract.

“Respect for the law and the maintenance of high ethical standards are essential for the company’s continued long-term success”

General principles	1
Raising Questions, Reporting and Principle of Non-Retaliation	2
Respect and Non-Discrimination	3
Occupational Safety and Environment	4
Use of Company Assets, Resources and Ideas	5
Conflicts of Interest	6
Full Exercise of the Business Activity	7

Remember, the Code of Conduct must be applied without exception.

Chapter 1: General principles.

SUMMARY OF CHAPTER 1

- The company expects employees to comply with the rules and laws at all times without exception and to perform their work ethically.
- The company also expects employees to report any situations or behaviors contrary to the law or regulations in order to correct them.
- In case of any doubt, you should always ask
- In addition, managers and directors shall have the obligation to promote compliance and encourage their employees to express their doubts.

The objective of the implementation of the Code of Conduct is that all employees:

- Comply with all regulations and laws at all times.
- Always perform your work with honesty and integrity.
- Always treat others with dignity, respect and sensitivity.
- Promptly report incidents, infractions and problems.
- Demand that of themselves, their peers and their bosses.

Personal obligations

It is the responsibility of all employees:

- Always act in accordance with all applicable laws, this code, company policies and procedures.
- Not to participate, either inside or outside the company, in illegal activities covered by the Penal Code, or commit crimes.
- Know the laws, regulations and internal policies related to their work.
- Report any cases of non-compliance, actual or potential, so that corrective actions can be initiated.

This is an additional responsibility of all managers and directors:

- Set an example.
- Encourage employees to raise questions and concerns.
- Prohibit retaliation.
- Foster a culture based on compliance and ethics by establishing it as a constant priority and rewarding the promotion of compliance.

In case of doubt, always ask

Violations of the Code of Conduct

Violations of the Code of Conduct are subject to disciplinary action and, depending on the violation, may result in:

- The termination of the employment relationship, in accordance with the applicable legislation, your contract or the applicable collective bargaining agreement.
- Criminal or civil penalties, or other legal liabilities for the offending employee.



Chapter 2: Asking Questions, Reporting and the Principle of Non-Retaliation

1. Questions

As noted in the previous CHAPTER, a basic aspect of applying the Code of Conduct correctly is to ask questions. Whenever you are in doubt as to how to act in accordance with the Code of Conduct, you should always ask questions.

You must also remember that it is your responsibility to apply the Code of Conduct correctly, so it also becomes your responsibility to ask questions and resolve your doubts before acting.

Questions should be directed to those who have the knowledge to answer them. Address your questions to:

- Your boss
- To the Human Resources Director
- To the company's compliance officer
- To any other director as he/she deems appropriate
- Or, in certain cases, their external specialist advisors (lawyer, tax advisor...).

Remember:

Never be in doubt, ask for as many clarifications as you need. You do not have to make the decisions alone. Behavior in accordance with the Code of Conduct is a priority.

Sometimes doubts arise as to whether what is being done or is going to be done is correct or not. There are a number of indicators that will help you understand if you should stop and ask such as:

- Feeling uncomfortable with what you are doing or have to do.
- Justifying their actions by thinking that "everyone does it" or "it has always been done this way".
- Whether you would mind it being known publicly or would not like your family to know.

If you experience one of these feelings, it is time to ask for help. Stop and think about what you are doing and seek advice. Always be sure that you are acting correctly and in accordance with laws and regulations.

No one knows everything, practice humility and intellectual honesty.

SUMMARY OF CHAPTER 2

- Respecting laws and regulations and behaving in accordance with the code of conduct is a priority and, therefore, whenever you have doubts or concerns about what you are doing or are going to do, you should always ask.
- Whenever you have knowledge or reasonable suspicion that an illegal act is being committed or that you are acting contrary to the Code of Conduct, you have a duty to report it.
- The company guarantees the anonymity of employees who report in good faith and prohibits any form of retaliation.

2. Information

As indicated in CHAPTER 1, employees have the obligation to report when they have knowledge, or well-founded suspicion, of any illegal act or any violation of the Code of Conduct committed in the company so that, in this way, the activity can be stopped and corrective and preventive actions can be initiated immediately so that it does not happen again.

- *Whenever you do not know what to do in these circumstances, ask for help.*
- *Doing nothing is not a correct alternative.*
- *Failure to report a violation or potential violation is tantamount to covering up or tolerating it.*

It may happen that you do not feel comfortable reporting to your superiors or fear possible adverse reactions to reporting or expressing your concerns. In this case,

use any available channel to bring your information to the attention of the company's management. The company's management guarantees the confidentiality of information and the principle of non-retaliation.

Anonymous letters are not an acceptable means of communication. They usually raise doubts about their credibility.

The company has expressly created a Compliance Committee that will review any complaints or reports on compliance with regulations and laws. It will also organize the necessary controls and audits to ensure that all employees comply with all applicable laws and regulations at all times during the course of their work¹.

3. Principle of non-retaliation

The Company expressly prohibits any retaliation by the Company or any of its employees for reporting, or for announcing its intention to report, lawfully and in good faith, any legal violation or breach of this Code.

Good faith means not that the facts or concerns ultimately reported are in themselves correct or true, but that complete and reliable information has been provided and that there is a reasonable and sincere belief that an infringement is being reported.

¹ On the last page of the Code, you will find the list of means by which you can send your questions, information or complaints with the guarantee of confidentiality.



Chapter 3: Respect and non-discrimination

1. Respectful treatment and non-abuse.

Respect is one of the basic pillars of coexistence and is fundamental for teamwork. Diversity always adds value and we must appreciate it.

Each employee should strive to create a work environment where everyone is treated with dignity, respect, honesty and sensitivity.

It is forbidden to inflict on another person any kind of degrading treatment or to undermine his or her moral integrity.

Such conduct or manifestations may consist of verbal expressions, drawings, jokes, pranks, e-mails, nicknames, gestures, unwanted physical contact or any other, especially if they occur repeatedly or repeatedly and/or are directed towards a specific person.

The correct use of the company's electronic media will be discussed in greater detail in CHAPTER 5, as the dissemination of any of the statements prohibited in this section is an aggravating circumstance.

Remember: no respect, no teamwork

Abuse of any kind is a prohibited practice. No one should take undue advantage of another person through any practice.

Hostile or humiliating acts of any kind will not be tolerated, especially in the case of a hierarchical superior with respect to a subordinate.

The offending behaviors described in this chapter are particularly serious and regardless of the disciplinary actions that may be taken by the company, they are prosecuted and punishable under the Criminal Code with penalties of up to two years' imprisonment.

2. Non-discriminatory Treatment and Equal Employment Opportunity.

The company values and champions diversity and believes in equal opportunity for all.

Any discrimination based on skin color, race, religion, gender, sexual orientation, nationality, ancestry, age, disability, health, pregnancy or any other factor prohibited by any applicable law is prohibited. This prohibition is especially applicable both in the hiring of new employees and in the promotion of internal personnel.

It is expressly forbidden to condition the hiring or promotion of an employee on factors unrelated to his or her professional merits or his or her ability and competence for the position to be held.

Job offers will not be conditioned by any of the aforementioned factors and, consequently, no questions will be included in the hiring process related to them.

In the event that a candidate voluntarily provides personal information, it should not be taken into consideration except as it relates to his or her competence and ability for the position.

- The company is not interested in knowing whether a man or woman has family responsibilities. It is interested in knowing, for example, if he or she can travel 40% of his or her time because the position in question requires it. In this case, the candidate should be asked if he/she can travel 40% of his/her time and not because of his/her family situation.
- In the job description, which includes working at heights, the candidate states that he suffers from vertigo. In this case it is legitimate to consider this information as it directly affects his ability to perform the duties of the position.

All employees are required to report any violation of the above to their supervisor, the Human Resources Manager or the Compliance Officer.

SUMMARY OF CHAPTER 3

- Each employee must strive to create a work environment where everyone is treated with dignity, respect, honesty and sensitivity. It is forbidden to inflict any kind of degrading treatment on another person or to undermine his or her moral integrity.
- Abuse of any kind is a prohibited practice.
- Any discrimination based on skin color, race, religion, gender, sexual orientation, nationality, ancestry, age, disability, pregnancy or any other factor is prohibited.
- The unauthorized disclosure of personal data and its use for purposes other than those for which the data subject has given his or her consent is prohibited.

3. Employee privacy and data protection.

The Company, in order to perform its functions, possesses and retains certain personal information about employees and third parties.

This information can be of many types and includes personal data of Employees; Candidates; Customers and Suppliers; Potential Customers; People captured by video surveillance cameras; Partners etc... and can be in different media.

The law defines a personal data file as any organized set of personal data, whatever the form or modality of its creation, storage, organization and access.

These include, for example, computer databases (both specialized software and simple Excel spreadsheets); paper-based lists; a contact book, either computerized or manual; camera footage, etc.

The protection of personal data is a constitutional right of citizens and its treatment is regulated by law. Its unauthorized dissemination and its use for purposes other than those for which the owner of the data has given his consent is prohibited.

The company and employees, who have access, will treat this information in accordance with the Organic Law on the Protection of Personal Data and other regulations in force to ensure your privacy. Therefore, employees who have access to personal data of employees or third parties must be aware of the applicable legislation in force.

Chapter 4: Occupational Safety and Environment

1. Respectful treatment and non-abuse.

The company's policy is to manage its workplaces in a manner that protects as a priority the health and safety of its employees and the communities in which it operates. The company and its employees will manage the business, without exception, in accordance with the regulations and laws in force at all times on safety, health and environment. In this sense, employees will follow the company's regulations, prioritizing safety, occupational health and respect for the environment over any other consideration.

Health and safety have absolute priority over any other activity of the company.

All employees must, without exception, know and follow the safety, occupational risk prevention and environmental regulations that affect their work. They also have the duty to report any risk detected, and any incident or accident occurring in these matters.

In some jobs or specific tasks, the company, in accordance with current legislation, has determined, or may determine, the use of individual protection elements (gloves, goggles, reflective vests, etc.) or

specific safety measures and protocols. Their use or monitoring are absolutely mandatory and it will be a specific duty of managers and directors to ensure it. Violations of the regulations on this point are particularly serious and will always be subject to disciplinary action against the offender and against his supervisor if it is considered that he has omitted his duty of control.

Drivers and, in general, all collaborators and employees who travel by road on their work, whether in their own vehicle or in a company vehicle, must always respect the traffic regulations and, in particular, the rules of the road:

- Speed limits
- The use of seat belts
- Banning the use of cell phones without hands-free equipment
- Do not drive under the influence of alcohol or other substances prohibited by law.

SUMMARY OF CHAPTER 4

- Safety, health and respect for the environment are a priority for the company and its employees.
- All employees must be familiar with all the rules that affect their work in these matters and comply with them as a matter of priority.
- It is not permitted to consume alcoholic beverages or drugs of any kind in the workplace, nor to work under the influence of alcoholic beverages or drugs of any kind.
- Violence of any kind is not permitted in the workplace. The possession of any type of weapon is prohibited in the workplace.

Alcohol and drugs:

In order to provide a safe workplace, the possession and consumption of any type of drugs or alcoholic beverages in the workplace is prohibited.

There are circumstances such as business meals or special celebrations organized by the company in which it is acceptable to consume alcoholic beverages as long as it is done responsibly, in moderation and does not violate the law (serving a minor or driving

under the influence of alcohol for example). You should be aware, however, that if you have consumed alcoholic beverages and must return to work, you may not do so if you are under the influence of alcohol and doing so will be considered a violation of the Code of Conduct.

The company, in accordance with the law, has the right to verify this.

Violence and Weapons:

Violent behavior and threats of any kind are prohibited. The possession of any type of weapon, visible or not, is also prohibited in the workplace. This policy does not apply to work tools approved or provided by the

company for the performance of work, or to security personnel who are required by their duties to carry a weapon.

Chapter 5: Use of Company Assets, Resources and Ideas



1. Assets and ideas.

a) All employees have the obligation to protect the company's assets and resources and to ensure their proper use with the highest level of integrity. The company will apply a zero tolerance policy for theft, robbery, fraud and misappropriation.

Cases of theft of material of little individual value (office material for example) are not admissible. The fact that the objects in question are of little value removes the feeling of guilt or crime, since there is a risk of generalization that causes serious damage to the company as a whole.

b) Intellectual property, as well as any other Company records or information must be equally protected as they constitute a competitive advantage for the company. All employees have a duty to protect all confidential company information. You must not share it with others outside the company or your department without express authorization. This obligation not to disclose confidential company information extends beyond the termination of the employment relationship with the company.

c) Employees shall respect intellectual property laws and may not make unauthorized copies of software or use or download material without the authorization of its owners for their work. Nor may they do so for private use from the company's computer systems.

d) The law expressly prohibits the use of privileged information obtained through the performance of their employment in the company for any purpose not related to the legal management of the company.

e) Employees shall make responsible use of files and archives with company information that may come into their possession, whether they are the result of their own work or that of a colleague or representative of the company, and shall refrain from deleting/modifying/deleting any file or even the information contained therein if this is intended to eliminate their own work and/or is intended to harm the company. All the information worked for the company by the employee will be considered property of the company.

f) In case of termination of employment with the company the user will be obliged to respect the content of the electronic devices made available to the company so that the company can make use of the information contained therein. The company also undertakes to respect the privacy of this person by immediately destroying any personal files on these devices at the time of such termination of employment, and not to copy, use or manipulate them under any circumstances.

Confidential Information includes, among others, discoveries, concepts, ideas, knowledge, techniques, designs, drawings, drafts, diagrams, models, samples, organization charts, databases of any kind, photographs of the facilities, as well as any technical, financial or commercial information.

2. Use of the company's electronic and communication systems.

The company's electronic and communication systems include computers, printers, data storage systems, scanners, fax machines, photocopiers, e-mail, Internet, fixed and mobile telephones and PDAs. Rules of use:

a) The company's electronic and communication systems are made available to employees to carry out their work as efficiently as possible and employees are expected to use them appropriately, in accordance with company standards, and to ensure the security and confidentiality of information.

b) It is not permitted to use the company's electronic systems for private purposes, whether during or outside working hours, without express authorization to do so. The company, in certain circumstances, may occasionally allow its personal use, infrequent and without abuse, provided that it does not involve a conflict of interest, does not have an illegal purpose, nor is it done for profit.

c) It is not allowed in any case:

- Visiting Internet sites that may be considered inappropriate, offensive, indecent or abusive and, in general, that go against the principles promoted by this code.
- Access to Social Networks, chats, blogs, web pages that require data exchange, etc., of a private nature from the company's electronic systems and, particularly, during working hours, unless it is done with the knowledge and authorization of the Management, and always within the framework of supporting the company's communication actions in these media and even as part of the tools that the company may have as private within the framework of the operation of these public tools.

- The storage or transmission by any means of the company, and in particular by e-mail or cell phone messages, of inappropriate, offensive, indecent or abusive materials and in general that are contrary to the law and/or that go against the principles promoted by this code.
- Introducing, downloading, reproducing or distributing in the company's computer systems, computer programs without a license, or not previously authorized by the company. Likewise, it is also forbidden to download or use any work/material (texts, images, logos, trademarks, etc.) subject to intellectual and industrial property rights, without due authorization from their owners.
- Voluntarily introducing programs, viruses, macros, applets, ActiveX controls or any other device that may cause any type of alteration in the computer systems of the entity or third parties.

d) The user shall be obliged to use the antivirus programs and their updates made available by the company.

e) The company provides itself with the data storage space necessary to carry out its activity. The storage of employees' private data, such as files (music, photographs, etc.) or e-mails, takes up space and is generally not permitted. The company may dispose of this space by deleting such files if required.

3. Use of e-mail:

a) The company's e-mail address should not be used for personal purposes. In case of receiving private mail, you must indicate this circumstance to the sender to avoid future mailings and proceed to delete it as soon as possible.

The company, as a subsidiary civil liability, and criminally liable in the case of certain crimes committed by its employees in the course of their work, is legally empowered to control and view e-mail, its attached files and Internet access in order to avoid and/or prevent the commission of illegal actions, crimes or behaviors contrary to this code. To this end, the company may carry out audits and/or use means of monitoring the use of the systems.

In the event that such reviews are carried out due to suspicions that the e-mail is being used illegitimately, the review will be carried out, as far as possible, in the

presence of the user concerned, or, where appropriate, of his legal representative or notary public, in order to respect the dignity of the worker.

b) It is not allowed in any case:

- The sending of inappropriate, offensive, indecent or abusive materials and in general that are contrary to the law and/or that go against the principles promoted by this code.
- Sending mass e-mail messages that may be considered Spam.
- The initiation or continuation of chain e-mail messages.
- Opening e-mail messages where the sender is not fully identified, or where there is confusion about the sender's identity.

Always be wary if you receive emails requesting security codes, checking accounts, notifying you of winning lotteries, offering easy, well-paying jobs, etc.

The generalization of e-mail has led to a loss of formality in written communications. However, there are certain rules that should be followed to optimize its use:

- Use the subject field to briefly indicate the content.
- Only copy the necessary people.
- In the case of general communications, place the distribution list in blind copy.
- Print on paper only when necessary and not per system.

- As a general rule, do not write anything that cannot be read in front of a judge.
- Limit forwarding chains, which often end up revealing information to unintended recipients.
- Keep your personal folders from becoming too bulky.
- Follow a policy of deleting old mail.

SUMMARY OF CHAPTER 5

- Employees have a duty to protect the company's property, assets, ideas, intellectual property and information and to keep them confidential.
- They will strictly respect intellectual property laws and will not use privileged information for their own benefit or for the benefit of third parties.
- The company's electronic and communication systems have been made available to employees for the efficient performance of their work and their personal use is not permitted without express authorization.
- The use of the company's electronic and communication systems shall always be in accordance with the laws and regulations and in compliance with the principles of this code.
- Employees must at all times ensure the accuracy and integrity of the company's records.

4. Integrity of the information.

All company records, especially financial records, are the basis of management and must be accurate and reflect always the reality of the company. Employees are obliged to ensure the integrity and veracity of these records, and it is strictly forbidden to falsify or

alter them directly or indirectly. It is also forbidden to conceal data or alter or unduly influence, or attempt to influence, the work of both external and internal audits.

5. Computer crimes.

It is a criminal offense under the Penal Code to proceed without authorization to delete, damage, deteriorate, alter, suppress or render inaccessible data, computer

programs or electronic documents of others, as well as to hinder or interrupt the operation of another's computer system.



Chapter 6: Conflicts of interest

Conflicts of Interest

A conflict of interest arises when personal, social, financial or political activities interfere or have the potential to interfere with our responsibilities to the company.

It may be a conflict of interest if the employee or immediate family members are customers or suppliers of the company, or if they have an employment relationship with a competitor. It may also constitute a conflict of interest to accept, outside working hours, work for a supplier or customer of the company.

Employees and their immediate family members should avoid entering into actual conflicts of interest; we even recommend avoiding the appearance of a conflict.

External work

It is not forbidden to work or invest in another company as long as this does not represent a conflict of interest (such as working for a supplier or customer), nor does it affect your work performance (for example, if the external work is as a night watchman, it can clearly influence your performance). The employee is, however, obliged to inform the company of this circumstance.

Gift Policy

It is common commercial practice to exchange gifts, especially at Christmas. As a general rule they are not prohibited as long as:

- Not requested.
- Be legal, simple and of limited value.
- Making them have a business purpose.
- Do not pose a conflict of interest or interfere with your business judgment.

As a general rule, you must request authorization to give gifts, or inform us if you receive a gift, if the gift in question has a value greater than 100 €.

Gifts in cash or gifts that can be converted into cash (prepaid cards, gasoline checks, etc.) are never acceptable.

It should always be consulted, regardless of the value, when the recipient is a public official.

It is strictly forbidden to offer or accept any kind of bribe.

SUMMARY OF CHAPTER 6

- Employees and their immediate family members must not enter into conflicts of interest with the company.
- The company must be informed of any paid outside work.
- It is not permitted to use opportunities discovered in the course of work for the company to one's own benefit.
- It is not permitted to solicit gifts or benefits from third parties and their acceptance must be subject to the condition that they are legal, simple, of little value and do not generate or may generate conflicts of interest.
- Gifts are only permitted if they are for business purposes and are not intended to interfere with the recipient's judgment.
- Authorization must be requested to give or receive gifts valued at more than €100.
- Meals or events with suppliers or customers should always have a business purpose and should not be repetitive.
- Political activities are not permitted in the company or using company equipment.

Opportunities in the Company

Employees are prohibited from taking for themselves any opportunities they discover in the course of their work or using company resources or assets without the express authorization of the company's legal representative.

Political activities

Any political activities or donations to political parties or other organizations carried out by an individual employee must be performed outside working hours and without the use of company facilities or equipment.

Business lunches and attendance at events

Business lunches with customers or suppliers are a common practice but should be limited to business purposes. Repetition with the same suppliers or customers should be avoided.

Attendance at events sponsored by customers or suppliers, especially if they include leisure activities, should be accepted only if there is an expectation that attendance will provide a benefit or opportunity for the company. In any case, you must request permission to attend such events.



Chapter 7: Conducting business activities

Free competition (Antitrust Law)

The company's policy is to comply with all applicable antitrust laws. Employees, in accordance with the responsibilities of their position, must understand and comply with the law and avoid anti-competitive practices, particularly with regard to negotiating sales prices and prohibiting the fixing of resale prices or margins.

Avoid having contacts with competitors and in case you have them:

1. Never discuss prices or price variations and, of course, never agree on prices.

2. They are prohibited:

- the distribution of areas, markets, customers or suppliers (sources of supply).
- boycott of products, suppliers or customers
- non-competition covenants or non-competition agreements.

The above list is not exhaustive. Always consult with your manager or the Compliance Officer if you are in doubt about the legality of a business practice.

Public and private anti-corruption laws

It is forbidden by law to offer or accept from/to directors, managers, employees or collaborators of another company a benefit or advantage of any nature that is not justified in order to favor or that favors one or a third party over others. In this regard, the provisions of the following point apply d) of the previous CHAPTER regarding the gift policy.

These behaviors are especially serious in the case of public officials. Employees shall be required to request approval for contact with a public official and especially for the delivery of any type of gift, including samples of

company products or promotional material used in the commercial action.

Charitable works and product donations, even in the case of obsolete material, must always be approved by the company's management.

Both in the case of public officials, of any country, or private individuals, it is strictly forbidden to make or receive illegal payments.

SUMMARY OF CHAPTER 7

- Free competition is a principle of the company and its employees must comply with antitrust laws and in the performance of their duties must not perform acts contrary to it.
- It is strictly forbidden to attempt to influence the will of a public or private official by offering gifts or other benefits.

Money laundering prevention laws

The Money Laundering Prevention Law regulates the obligations, actions and procedures to prevent and impede the use of the financial system, as well as other sectors of economic activity, for the laundering of proceeds from any type of participation in the commission of a crime.

If your responsibilities include managing clients and/or operations with a risk of money laundering, you should be aware of the legislation in force on the prevention of money laundering. This imposes, among others, certain obligations regarding the identification of customers and their activity, and the origin of payments.

Ethical line

As explained in Chapter 2, a basic aspect in the correct application of the Code of Conduct is to ask questions. This Chapter also includes the obligation of all employees to report when they have knowledge, or a well-founded suspicion, of any illegal act or any violation of the Code of Conduct committed in the company. To facilitate this communication, an Ethics Hotline has been created.

All employees or persons connected with ADER may send their questions or information to the e-mail address:

rrhh@aderonline.com

Messages, alerts or notices are collected and dealt with at this address and are treated with complete confidentiality.

All messages received must always be correctly written, identifying the sender of the message by name, surname, and the department or delegation to which he/she belongs. Anonymous messages will not be taken into account under any circumstances and will be automatically deleted.

A second means of communication is also provided through our external collaborator, Lant Abogados, and

its treatment will respect the identification parameters mentioned above, being that any anonymous message will not be sent to ADER.

The specific email address for ADER at Lant abogados is:

[Línea.etica-ader@lant-abogados.com](mailto:Linea.etica-ader@lant-abogados.com)

Lant Abogados and ADER guarantee confidentiality and the principle of non-retaliation with respect to employees who use this line for their inquiries or to submit information in good faith (Good faith is defined as having provided complete and reliable information and having a reasonable and sincere belief that a violation is being reported).

Communications received on the Ethics Line will receive an acknowledgement of receipt and will be forwarded to and analyzed by the Compliance Officer.

Once they have been analyzed, we will proceed as soon as possible.

In the event that criminal offenses are reported, ADER will, in parallel, bring it to the attention of the competent authorities.

Data Protection

We inform you, in accordance with Organic Law 15/1999 on the Protection of Personal Data, that your personal data provided by your company and those derived from the implementation of this Code of Conduct will be incorporated into our training file for the purpose of implementing the contracted program. We also inform you that your data related to the test exam of this code will be communicated to the managers of your company, and that they will be kept for the duration of the agreement that we maintain with your company for the purpose of accrediting the passing of the aforementioned exam. We remind you that at any time you may request your rights of access, rectification, cancellation and opposition by contacting LANT ABOGADOS (Lant Advisors, S.L.P.), -Data Protection Manager- Via Augusta, nº 59, entlo. 6ª, 08006 de Barcelona, or by email to luis.delamora@lant-abogados.com, providing a copy of your ID card.

Intellectual Property

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