



Gifts & hospitality policy

The ADER Group maintains a policy of transparency in relations with the public and private sectors, aimed at preventing any conflict of interest or appearance of partiality, ensuring that the company's business decisions respond exclusively to the challenge of providing an excellent and quality service.

Consistent with the commitments contained in our Code of Ethics and in particular with our value of Trust, this Gifts and Hospitality policy is established for the purpose of continuing to strengthen transparent and mutually beneficial relationships between companies and their stakeholders, within a framework of action that offers clarity and transparency to employees, suppliers, customers and third parties, on the company's position with regard to hospitality between parties through gifts, entertainment or hospitality.

The ADER Group is committed to fostering a culture of integrity that promotes strict compliance with laws, regulations, internal codes and best practices applicable to the sector. In this sense, it condemns corruption both in relations with the public administration and in private spheres, establishing zero tolerance for this type of behavior. This policy reflects the ADER Group's desire to prohibit conduct that could be interpreted as contrary to this culture of integrity.

The application of this Policy must start with the conduct of the employee himself, who must refuse gifts or any type of gift or attention provided by a third party (supplier, client, financial institution, etc.) that he considers (or sees the appearance thereof) that may affect the independence and integrity of his professional performance, or that may involve a conflict of interest at present or in the future, or that may lead him to assume any obligation or favored treatment vis-à-vis the third party.

The same applies to the giving of gifts to third parties, if it is understood or perceived that such gift may compromise the independence of those who receive it.

For all these reasons:

- The solicitation or acceptance of any type of payment, commission, gift or remuneration by employees for transactions carried out by the ADER Group or in connection with the professional activity carried out in the ADER Group and originating from customers, suppliers, intermediaries, contractors or any other third party is prohibited.
- The giving or offering of any type of gift or attention that may be construed as exceeding normal courtesy practices or in any way intended to receive or provide favorable treatment in the performance of any activity that may be linked to the ADER Group is prohibited. Any item that is one of many identical items that are widely distributed (e.g. pens, calendars, promotional materials, logo-engraved items, etc.) produced by the ADER Group for promotional purposes only, shall not be considered a gift.
- It is prohibited to benefit personally by virtue of one's position in the ADER Group or a business opportunity in which the ADER Group is involved.

This policy applies to the entire ADER Group and its related companies, to all Executives, members of the Management Committee, collaborators, suppliers and clients, as well as to those representing the company, regardless of the type of employment, commercial or legal relationship established, and regardless of hierarchical level.

Compliance with ethical norms and standards is a commitment for the entire ADER Group and constitutes a strategic objective for the Group. Therefore, all ADER Group employees are aware of the contents of this Policy, and are the main guarantors of its maintenance and application. Likewise, third parties with whom the ADER Group maintains business relations are expected to conduct themselves in line with this Policy.

Jordi Iglesias
CEO