

ETHICAL CODE

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Approved by: Compliance Committee



CHANGE CONTROL						
Edition		Author	Changes summary	Reviewed	Approved	Date of approval
#	Date					
1.0	Dec -11	ALSA	Initial version	Compliance Committee		
2.0	Dec -18	ALSA	Review by consulting BDO	Compliance Committee		
3.0	Ene-19	ALSA	Legal Services Division	Compliance Committee		
4.0	Sept-21	ALSA	Addition of improvements proposed by AENOR	Compliance Committee	Compliance Committee	22/09/2021
5.0	Jun-22	ALSA	- Homogenisation of the Code of Ethics for its application in all countries (elimination of express references to Spanish legislation). - Updating of the Helpline.	Compliance Committee	Compliance Committee	31/05/2022



Francisco Iglesias Campos

CEO, ALSA

CEO Report

In order to ensure an ethical performance of the work in all divisions, National Express Group has drafted a document including the Anti-Fraud Policy of the Group designed to define the managers and employees' roles as to the prevention of fraud and development of controls to identify them.

Actions such as the theft of company property, forgery or alteration of corporate documents, unauthorised disclosure of confidential information, etc., must be identified and reported following the channels that have been defined.

The document attached includes the Anti-Fraud Policy of National Express Group, as well as the Ethical Code and Best Practices of ALSA drafted to align the anti-fraud policy of National Express Group to the uses and customs of the Spanish market and the law into force, to ensure the honesty and transparency in the actions of any person with a business or corporate relationship with National Express Group: employees, shareholders, consultants, sellers, contractors, etc. and in particular, with ALSA Division.

We are a company providing a public service, so we are even more committed to provide a good image and reputation for our customers, clients, shareholders and public administrations.

As ALSA employees, we must act with integrity and responsibility across all the company and to be a role model in ethical performance, and to further promote the Group's Values.

ALSA Exec Team is committed to fight fraud, not only to create a climate of transparency in the management, but also to protect the assets of the Group and avoid any financial losses.

Yours faithfully,

Francisco Iglesias

CEO, ALSA

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1. INTRODUCTION TO OUR CODE

This Code sets the basis for our Ethics and Best Practices Programme. It has been designed to help us meet our commitment to ensure integrity in our daily activities. This guides us in key areas, helping us to perform our activities in accordance with the ethical regulation of the NATIONAL EXPRESS Group (hereinafter "NEG"), as well as the applicable regulation.

In this report, ALSA states and assures zero tolerance to any behaviour that may imply any infringement of this, of the internal procedures and the current regulation. Additionally, this is aimed to regulate those behaviours, actions or facts that may constitute violations both of the internal rules of the Group, or of the regulation or ethical codes governing the activity performed by the Group.

Alsa's Ethical Code includes all the principles and action guidelines of a good corporate governance.

This Code does not include any potential situation that may take place, however it sets the principles that should inspire at all moments the behaviours of any person working for ALSA.



In case of doubt, we should submit our question to the Compliance Committee through the mailbox enabled for that purpose (buzon.compliance@alsa.es).

For this purpose, it is essential that all staff is aware of this Code and that they all meet with it in their daily activities, meeting all the principles set. All this, without prejudice of what any internal rules of special condition may settle, and obviously, the current law into force, that will prevail in case of conflict or contradiction with this Code.

2. SCOPE OF APPLICATION OF THE POLICY

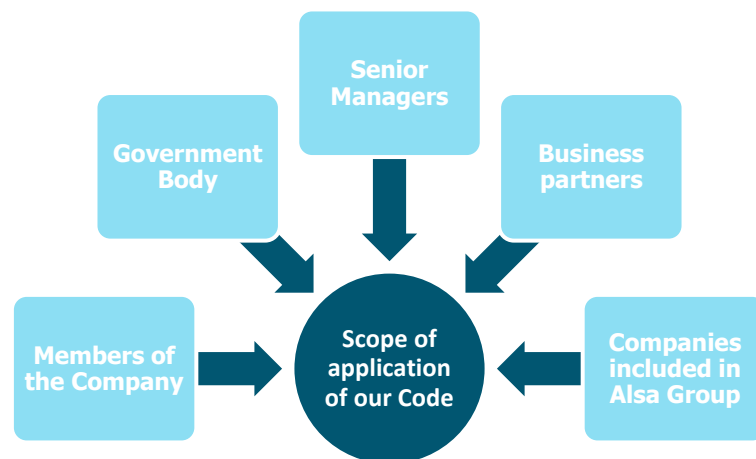
The scope of application of this Ethical Code affects all the employees, managers and directors of ALSA and of any entity where any ALSA company has either a full or shared control.

This Code is, therefore, mandatory in all ALSA Group and shall be complied with, including all the companies included in the ALSA Group, understanding all the partially owned companies controlled by General Técnica Industrial, S.L., regardless the sector of activity and their size.

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Also, all people, both natural or legal persons, holding any kind of relationship with the NEG Group in the performance of their professional or business activities, including, but not limited to, external auditors, consultants, advisors, suppliers, advertisers, etc., shall be bound to the compliance of this Code.

Simply complying with the Code is not enough. We must also remember our responsibilities with others, and towards our communities, clients, shareholders, suppliers and other business partners. It is the obligation and responsibility of all employees to know this Code of Ethics.



3. VALIDITY PERIOD

ALSA approved the first Ethical Code in 2010, entering into force on 1 December 2011. Later, the code was updated, and approved on 21 December 2016, and entering into force on 1st January 2017. In addition, a new update was added to this in December 2018, entering into force in January 2019.

As to the present document, it was approved on 22 September 2021, entering into force since the approval date.

4. COMPLIANCE COMMITTEE OF THE ETHICAL CODE

The Compliance Committee of the Ethical Code was created as a body to enforce the communication, knowledge and compliance of the code, ensuring its compliance.

The Compliance Committee consists of the Legal Services Corporate Division, the Human Resources Division and the Financial Division, and will report organically and functionally to ALSA's CEO.

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The Director of the Human Resources Division will perform the management and control activities of the Compliance Committee.

The Compliance Committee will have the following functions and powers:

- a) Address any questions that may be proposed regarding the interpretation and application of this Code.
- b) Draft reports on the level of compliance of this Code, as well as the non-compliances identified.
- c) Assess the eventual non-compliances of this Ethical Code.

5. OUR VALUES

Our Ethical Code is based on the five Values of ALSA; Excellence, Safety, Customers, People and Community.

6. ESSENTIAL ETHICAL PRINCIPLES

The following ETHICAL PRINCIPLES that are mandatory in the daily tasks performed within the Group are:

- **Legality principle**



The compliance with the legal order is a core mandate for ALSA in all the countries where it is present at. All employees must comply with the regulation on the legal system into force in the area where they work, added to the applicable internal policies of NEG and ALSA. The non-compliance with the Law should be avoided under any circumstance.

Regardless the sanctions that may be applied by Law, any employee held liable for a violation of the legal system shall be subject to disciplinary consequences resulting from the infringement of his/her obligations as an employee.

Therefore, it is expected that, when dealing with clients, Public Administrations, suppliers and other partners, we act in the interest of ALSA and in accordance with the Lays and regulations resulting from its application.

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- **Principle of integrity and professionalism**



ALSA promotes integrity and professional skills as a leading element in the labour relations held in the company.

Professional skills in the performance of the work duties are understood as any diligent, responsible, efficient action focused on excellence, quality and innovation.

The integrity in the performance of the work duties is understood as any loyal action, performed in good faith, objective and aligned with the interests of the Group and/or the ALSA Division.

ALSA reputation is based, to a large extent, on our actions and the way in which everyone of us acts and behaves. An illegal or inappropriate behaviour by just one of our employees may cause the company a significant damage. Every employee should be aware of maintaining and promoting the good reputation of ALSA in each country.

ALSA employees are required to make business decisions in the interest of ALSA, not based on their personal interest. Any conflict of interests arise when employees get involved in activities out of their area of expertise in the company or when they act based on their personal interest.

Employees, then, should report to their line manager on any personal interest that may exist in the development of their professional duties. Employees shall not use, to sign contracts or make personal orders, companies holding commercial or business agreements as part of their activities in ALSA, if as a result from that may arise any benefit for the contract or personal order.

A business relationship with any Alsa competitor or client, or the participation in additional activities, may lead to a conflict preventing employees to meet with their professional duties in ALSA. It is important that all of us, in the performance of our professional activities, recognise and avoid conflicts of interest or even the appearance of a conflict of interests.

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- **Principle of objectivity, impartiality and transparency in hiring suppliers**



ALSA has adjusted the recruitment and hiring processes of suppliers to objectivity, impartiality and transparency criteria. This principle shall be applied in all the stages of the negotiation or signature of the commercial contracts.

For that purpose, ALSA is obliged to promote the application by several suppliers of goods and services whose characteristics and conditions offered are adjusted, at all times, to the needs and conditions of the company established in the contracting specifications, always assessing the most advantageous offer.

Once the supplier has been selected, ALSA legal services will draft or monitor the relevant contract, adding to it a good behaviour clause drafted by the Legal Services division.

- **Principle of respect and equal opportunities**



ALSA believes that diversity makes the Group stronger. All, both the companies of the Group, and the employees, clients, customers and suppliers, must help to create an open, engaging working environment, and ensure that both our work colleagues and the people applying for a job position in ALSA have the same opportunities. Therefore, we must not discriminate against anyone on the basis of their personal features, such as the colour of their skin, their sex, race, religion, origin, political opinion, sexual orientation, social origin, age or physical or intellectual disability, in accordance with the principles set out in our Constitution and in the rest of the legal system, as well as in the Conventions of the International Labour Organisation, in particular those relating to equal pay and non-discrimination.

- **Protecting human and labour rights and combating modern slavery**



The aim of ALSA is to develop its activity with ethic and integrity, ensuring in any case the full compliance with the rights of the employees, according to the national and international applicable regulation. ALSA expressed its commitment and link with the respect of human and labour rights recognised in the national and international law, particularly in the International Labour Organization Conventions on forced labour (No. 29),

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freedom of association and protection of the right to organize (No. 87), the right to organize and collective bargaining (No. 98), equal remuneration (No. 100), abolition of forced labour (No. 105), non-discrimination (No. 111), minimum age (No. 138), and worst forms of child labour (No. 182).

On the other part, our parent company, the NEG group, as an English law company, is subject to the compliance with the current regulation since 2015 in the United Kingdom named "*Modern Slavery Act*", whose main objective is to fight against situations of slavery, traffic of human beings and forced labour. As a Division of the NEG Group, ALSA commits to apply any measure required to ensure the compliance with the policy adopted by the group in this sense, with the purpose of avoiding, in the exercise of its activity and in all the supply chain, any type of behaviour that may be classified as a form of modern slavery or traffic with human beings.

All ALSA staff shall be aware of the Group policy when performing their activity and in any negotiation with contractors or suppliers, ensuring that these are also aware and comply with the policy. Also, employees shall report any suspicious behaviour in the company that they are aware of, through the existing channels available, particularly through the HELP LINE included in section 8 of this document or the Whistle-blowing Channel enabled for these purposes.

- **Principle of secrecy and confidentiality**



ALSA is aware of the importance of complying with the principle of secrecy and confidentiality.

Therefore, ALSA employees undersign, as one of the contract obligations, their commitment to keep the secret regarding any data or information they are aware of, as a result of their work.

As a result, all employees shall use these data or information only to perform their functions, not being allowed to provide this information to other people different from those that need to know it for the same purpose, not using it for their own benefit or third-party benefit. This secrecy obligation shall remain in force once the labour relationship with the company has been terminated.

- **Principle of information security**



Information is an essential asset for ALSA, and as a result, it requires a proper protection. ALSA recognises the importance of having its information assets duly identified and protected, avoiding their destruction, disclosure, modification and unauthorised use, and commits to develop, implement, maintain and continuously improve all information security policies, procedures, controls and organisational structures required for this purpose and to ensure that the confidentiality, integrity and availability of the information is preserved, ensuring that users have access only and exclusively to the information they require for the performance of their duties.

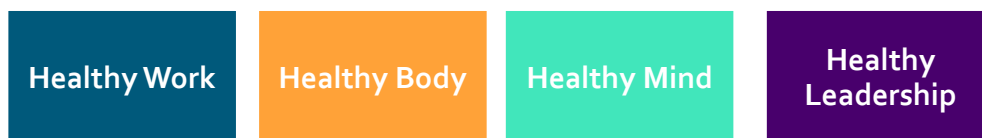
Therefore, all employees are responsible for keeping and ensuring the confidentiality, integrity and availability of the information assets of ALSA, complying with all the policies and procedures included in the Information Security Management System.

- **Principle of health, safety at work and environmental protection**

ALSA commits to reach the highest levels of safety and labour health in the place of work. ALSA implements programmes, training activities and internal controls necessary for the continuous promotion of safe working practices. With these practices we aim to avoid any risk to our colleagues, customers and communities. In this regard, we should be aware and meet all the procedures and policies of safety and health at the workplace implemented, particularly the Programme Driving Out Harm.

Based on the means provided by the company, all employees are responsible for ensuring that the working environment complies with health and safety requirements, and for carrying out their activities in the most scrupulous observance of health and safety standards and policies.

"For your Health" - lines of action



ALSA has in place policies, procedures and rules for preventing accidents at the workplace and to keep safe all their employees. Also, ALSA sets in all the contracts signed with suppliers clauses ensuring that these commit to meet and

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comply with the regulation in terms of prevention of occupational risks, to ensure the safety of their employees in the performance of their professional duties, and to protect the environment and ensure an efficient management of emissions and waste.

ALSA recognises its responsibility to the global community to protect the environment and has the ambition to become an eco-efficient company. We must promote eco-efficiency in all our business activities, striving to reduce our carbon footprint and the global environmental impact. We must, then, meet with all the laws and regulations enforceable regarding the environment, whenever we perform our activity, trying to go the extra mile.

Alsa's activity has always been underpinned by the concept of a comprehensive approach to transport with permanent customer satisfaction, performing its activity based on the following Values: **Excellence, Safety, Customers, People and Community**, discussed in the Section 5 of this Code.

These principles and values will be our guidelines and shall be taken and implemented by all areas of the ALSA business, and properly cascaded by manages to all the employees of the company. The alignment with the new Vision and Values will be our guideline, to be followed in all our business areas and units, used for the decision-making processes and strengthening our position as a leading operator in the transport market.



- **Drugs and Alcohol Principle**



It is strictly forbidden to possess, distribute or consume drugs of any kind during working hours. The consumption of alcohol during working hours is not permitted. Exceptionally, alcohol may be consumed in moderation at celebrations, meals and other situations typical of the culture or customs and provided that it does not affect the performance of work-related tasks.

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- **Audits and inspections**



All employees shall fully work together with the internal or external audits, investigations and enquiries conducted by the company. In addition, in the course of our business, we may be subject to investigations or requests for information by government officials or regulatory bodies. If we become aware of any potential investigation or enquiry, we must immediately notify our manager and the Legal Department before taking any action. All employees must cooperate fully and any information they provide must be truthful, clear and complete.

With respect to audits, investigations and enquiries, DO NOT:

- Destroy, alter or conceal documents in anticipation of, or in response to, a request for them.
- Provide incomplete, false or misleading statements to a company investigator or public official or attempt to influence others to provide them, unless the information or documentation requested is completely unavailable.
- Conduct an investigation on an individual basis, as the necessary and appropriate resources must be allocated to investigations.

6. SITUATIONS AGAINST THE ETHICAL CODE AND BEST PRACTICES

Our Code addresses potential ethical or legal dilemmas, but it cannot foresee all the potential situations that may arise. If we face a challenging situation, maybe the Code and the relevant procedures and policies would be enough to be a guideline. However, in more challenging situations, there may be necessary to find an additional orientation. Each of us has the responsibility to seek the necessary advice.

Therefore, any action contrary to the provisions of the following sections must be reported to the company as soon as possible, through the channels referred to in section 8 of this document.



In case of doubt, we should submit our question to the Compliance Committee through the mailbox enabled for that purpose (buzon.compliance@alsa.es).

6.1.Safety and legality in the operations

Any actions and/or omissions which, in the performance of the work, imply a detriment to the interests of NEG and/or ALSA Division, are considered actions contrary to the safety and legality of operations.

All the employees of ALSA Division shall always act in the interest of NEG, using properly any resource available and avoiding actions that may cause any damage to NEG.

Employees shall protect and care for company assets in their possession or to which they have authorised access, which shall be used in a manner appropriate to the purpose of their duties for which they have been entrusted.



Employees are obliged to comply with all applicable regulations in the fulfilment of their work duties and obligations. In this regard, as our main activity is the provision of public passenger transport services, full and strict compliance with the regulations governing road transport is of particular importance, and therefore, by way of example and not limitation, shall be considered a breach of this Code:

- Any use of the tachograph or any of its elements, the speed limiter or other instruments or control tools required to be installed on board the vehicle, with the purpose of changing how they usually work.
- The absence of the tachograph or any of its elements, the speed limiter or other instruments or control tools required to be installed on board the vehicle, with the purpose of changing how they usually work.
- The falsification of record sheets, driver’s cards or any other elements or control tools that are required to be fitted on board the vehicle, as

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well as the falsification of their content or alteration of the aforementioned record sheets or driver's cards required in board the vehicle.

- Any unthoughtful treatment, either in word or in deed, to any user by any employee of the company in the passenger transport services.

Reportable case of non-compliance with security measures: A and B are ALSA drivers. A is aware of the fact that B gave a in offensive treatment to some passengers.

Reply: A shall report this fact either to the line manager or to the Compliance Committee through the mail box enabled for that purpose (buzon.compliance@alsia.es).

- Not having the record sheet or the driver card in the tachograph, when it is required, or having inserted a record sheet without writing down the name and the surname of the driver, or having the record sheets or cards corresponding to other driver.
- The lack of record sheets of the tachograph, of the driver card or the documents printed required to be on board the vehicle.
- The failure to complete the manual notes regarding the driver's activity required by his/her when the tachograph is broken.
- The use of the same record sheet during several days when this may given place to the overlapping of records which prevents the reading.
- The use in the tachograph of more than a record sheet during the same day and by the same person, except when a vehicle is changed, and the record sheet used in the tachograph of the same vehicle is not approved to be used in the second vehicle.
- The communication by the company of the loss of the driving licence or any other specific licence required to perform their professional duties.
- Go to work or perform professional duties after consuming alcohol or drugs.
- Any negligent or intentional conduct that endangers the physical safety or integrity of oneself or other persons (colleagues, travellers, pedestrians or other drivers, third parties in general) or company assets.

6.2. Corruption

Any action or omission that generates or may generate a possible situation of corruption and/or bribery must be reported to the company immediately.

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By way of example and without limitation, bribery, influence peddling, etc., and other actions of similar characteristics as defined in the Criminal Code, are considered to be actions contrary to this Code.

Given the relevance and public importance in recent times of certain conducts or behaviours in the business sphere that could generate social rejection and, in certain cases, the commission of an illegality, for the purposes of this Code, bribery, influence peddling, bribery and public official shall be understood as the following:

6.3. Bribery

The offering or giving of a gift or any other kind of consideration to an authority, public official or person involved in the exercise of public authority to perform an act contrary to the duties inherent to his or her office or an act proper to his or her office.

A practical case of Bribery: A is a manager of an Area Unit, and he wants his company to be the winner of a tender after submitting a bid. For that purpose, he/she gives as a present to one of the civil servants some tickets to go to a music festival. Does this behaviour complies with our Ethical Code?

Reply: Absolutely not, it is one of the assumptions that go against the values of the company and this Ethical Code. Any employee aware of a situation of the like should report it with immediate effect through the mailbox enabled for that purpose (buzon.compliance@alsa.es).

6.4. Traffic of influence

Influencing a public official or authority by taking advantage of any situation arising from his personal relationship with that official or with another public official or authority in order to obtain a decision that may directly or indirectly generate a financial benefit for himself or for a third party.

6.5. Payoff

The promise, offer or giving, directly or indirectly, of any monetary or other inducement to a person to act or refrain from acting in breach of his obligations in order to obtain or retain an improper business transaction or advantage in the conduct of a business.

A practical case of Payoff1: A is an ALSA employee and submitted the bidding specifications to take part in a public tender. A is a friend of B, an employee in a company working in the passenger transport by road sector. A is aware that her friend's company is also going to the public tender aforementioned and she gives her 1,000 Euros to withdraw from the tender process, so A's company has more chances to win it. Is this an ethical behaviour?

Reply: no, the behaviour showed by A does not reflect the values and principles existing in ALSA. In the assumption that ALSA is aware of these actions, the relevant disciplinary system shall be applied.

A practical case of Payoff2: A is a driver of a sightseeing bus and agreed with the owner of a restaurant located out of the route to make the stops at his place in exchange for a commission for each passenger who eats at his restaurant. Does this behaviour comply with ALSA's Ethical Code?

Reply: this behaviour does not agree with the Principles and Values of ALSA; and in case you are aware of a similar situation, you shall report it through the Mailbox of the Compliance Committee with the purpose of being investigated and to apply the appropriate disciplinary proceeding.

- **Civil servant**

A person holding a legislative, administrative or judicial office in a specific country (including all the bodies and government entities, either national or local), either by appointment or by election. Any person holding a public role in a specific country, including agencies and public companies. Any agent or representative of an international public entity. It also includes candidates to political roles, employees or members of political parties.

6.6.Economic offences

Any action or omission that generates or may generate an indication of the commission, of an economic offence according to the provisions set in the Criminal Code, provided and when there was bad faith, this situation shall be reported to the company with immediate effect.

For these purposes, economic crimes are understood to be fraud, punishable insolvency, crimes against the Public Treasury and Social Security, falsification of certificates, misappropriation and other actions of similar characteristics typified in the Criminal Code.

Given the special nature and complexity of this matter, the Compliance Committee will be at the disposal of any employee to resolve any doubts as to whether or not an act that could be classified under this category has occurred.

Practical example of Economic Offence: A suspects that a Public Administration awarded a subsidy after the falsification of the conditions required for its awarding. What A should do?

Reply: A should report to the Compliance Committee the suspicions mentioned so the Committee can conduct an investigation and makes a decision about it.

6.7.Anti-competitive practices

Any action or omission that generates or may generate a potential crime of unfaithful competition, as well as any other anti-competitive practices, described in the regulation, shall be put into the knowledge of the company with immediate effect.

Only a faithful, honest competition allow the markets to develop freely.

All employees are bound by the rules of fair competition. Determining whether a case is subject to antitrust law can be difficult, mainly due to the fact that the rules may vary from country to country and from case to case. In any case, employees should not obtain competitive information through industrial espionage, bribery, theft or electronic eavesdropping, or intentionally communicate false information about competitors or their products or services.

Practical Case of Ant-Competitive practices: A attended a conference related to the transport industry and she met a former colleague there, B, who was working on a rival company. He told A about the current plans in her company regarding the bonus applicable and the promotional plans. What A should do?

Reply: A must stop the conversation and shall not use the privileged information obtained from her former colleague. Also, she must report to the Compliance Committee the conversation held due to the potential implications this may have.

6.8.Discovery and disclosure of trade secrets

Any action or omission that generates or may generate a potential crime of discovery and disclosure of secrets (privileged information), described in the Criminal Code or applicable law, shall be put into the knowledge of the company with immediate effect.

All information referring to ALSA that has not been made public will be considered as privileged and confidential information. Inside information may be acquired as a result of an employee's position and responsibilities or involuntarily and includes non-public information such as: financial results and/or budgets, dividends, mergers or acquisitions, divestitures, contract awards or strategic

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plans, litigation information, changes in management and business contracts or relationships.

Inside information must not be published or made available to third parties without authorisation. The publication of inside information is prohibited when it is done outside the regular area of the working tasks or activities, or in the compliance with other obligations in the name of ALSA. This applies both to the information published within ALSA, and outside ALSA, including reporters, financial analysts, clients, consultants, family members or friends. In addition, employees must always ensure that resources containing inside information is maintained in a manner that prevents unauthorised access.

Practical Example of the Discovery and disclosure of trade secrets A, as an ALSA employee and the role he holds, has access to the list of ALSA customers and the prices applied to them. A friend of A is currently starting his own business, and told A that it would be very useful to have access to the prices applied to ALSA customers. What should be the proper behaviour of A to act according to the Ethical Code and the ALSA Values?

Reply: A should not disclose the list of customers, as disclosing inside information of the company is against the provisions established in the Code of Conduct.

6.9. Intellectual and industrial property, damage resulting from the improper use of work tools.

Any action or omission that generates or may generate, among other things, an alleged offence against intellectual property or damage to the company's computer system must be reported to the company immediately.

Employees shall comply with the regulation on intellectual property and the right of use corresponding to NEG and/or ALSA regarding the licences projects, programmes and IT systems; equipment, technology, "know-how" and, overall, any work developed or created in NEG and/or ALSA.

Employees shall not use, in their own benefit, business opportunities belonging to NEG and/or ALSA.

Employees must comply with any specific rules regulating the use of e-mail, access to Internet or other media available, and in any case shall they be used improperly.

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Employees undertake to comply with their duty of secrecy and confidentiality with regard to all data and information they become aware of as a result of the normal course and fulfilment of the employment relationship, and this obligation shall remain in force even after the employment relationship with the company has ended.

7. CONFLICTS OF INTEREST

A conflict of interest is any situation in which the interests of the related persons related to NEG may be, either directly or indirectly, different or opposite to the companies that are part of the Group, either due to personal, professional, business reasons or otherwise; They shall comply with the provisions established in this document.

LISTING OF SOME EXAMPLES OF CONFLICTS OF INTEREST (NON-COMPREHENSIVE):

- Signing a contract in the name of NEG with a supplier partially owned or managed by a family member or a personal friend.
- Working as a partner of an ALSA supplier or client.
- Conduct businesses on your own account that are similar to the work done in ALSA.
- Having a personal or economic interest in a business with ALSA.
- Obtaining a personal or economic gain -different from the wage- as a result from an agreement reached by a third party with the NEG Group.



In case of doubt, we should submit our question to the Compliance Committee through the mail box enabled for that purpose (buzon.compliance@alsa.es).

8. RULES APPLYING TO GIFTS AND HOSPITALITY

In relation to business courtesy, gifts and hospitality offered to or received from customers, suppliers and other business partners are a widespread practice to foster good relations and to show appreciation for professional treatment. In any case, this courtesy should not influence, or give the appearance of influencing, any business decision.

Under no circumstances shall gifts of cash and/or monetary securities be permitted.

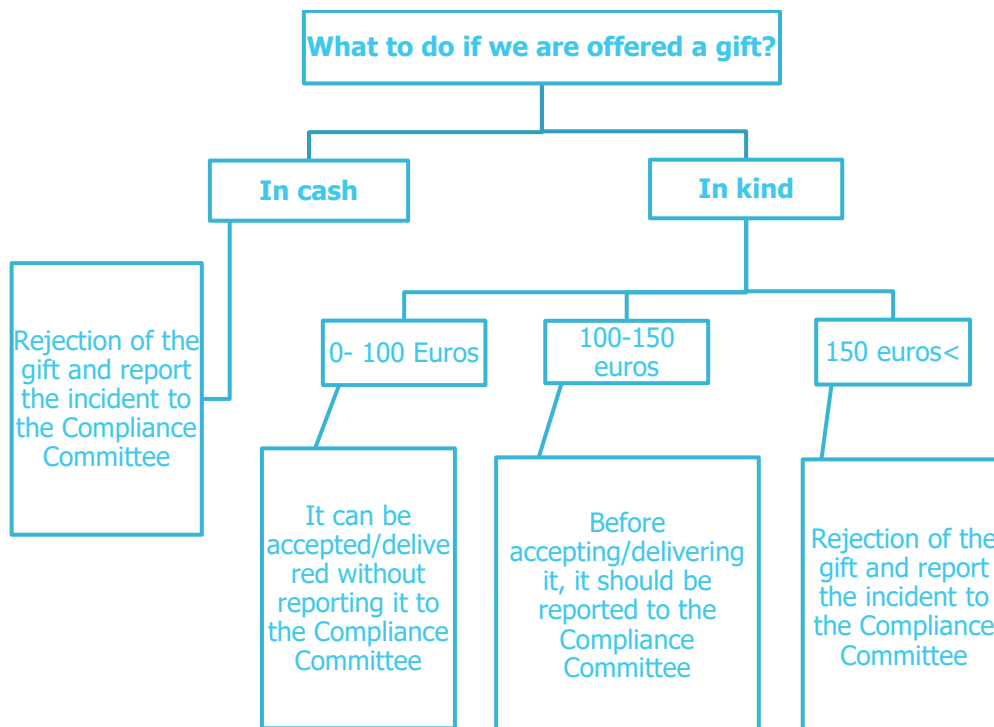
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In these situations we must be guided by good judgement, discretion and prudence.

With regard to the giving and/or receiving of gifts and/or tokens of hospitality, such as tickets to events, travel, accommodation and others, gifts and/or receipts of a value of more than EUR 150 or the equivalent value in another currency will not be permitted. In any case, the frequency of these gifts/hospitality will be assessed, and in case of doubt it will be consulted with the relevant line manager, the Compliance Committee or the Corporate Legal Services. To calculate these values, all gifts and hospitality received from the same third party in a period of 1 year shall be taken into account.

According to that, ALSA staff has the obligation to send to the e-mail address buzon.compliance@alsa.es, information of any gift or hospitality for an amount from 100 and 150 Euros, according to the model available. This information includes both gifts (hospitality received as an employee of ALSA, and those offered to third parties, in the name of the company or in our name as ALSA employees. Only the Christmas presents are excluded, as they are arranged as a Group.

It also applies to the assumption where the ALSA employees or managers offer gifts for an amount higher than 100 Euros.



9. RULES APPLYING TO POLITICAL CONTRIBUTIONS AND SPONSORSHIPS

ALSA does not make **political contributions**. As a member responsible for the company, ALSA makes money donations or services for education, culture and projects of social and humanitarian interest. In the development of social action activities, external projection due diligence procedures are applied on the persons and/or entities receiving the contribution.



In ALSA it is totally prohibited to finance political parties directly (e.g. campaign financing) or indirectly (e.g. donations to foundations associated with political parties).

ALSA sponsorships in advertising are not considered as donations. Also, contributions to employer's associations are not considered as donations, or the membership contributions to organisations serving business interests. Some donations are never allowed, including donations to (1) people and non-profit organisations; (2) made in private accounts; (3) organisations whose objectives are inconsistent to ALSA corporate principles; or (4) that may damage ALSA reputation.

All donations shall be transparent. This implies that the identity of the recipient and the intended use of the donation must be transparent and that the reason and purpose of the donation must be justified, documented and approved according to internal rules.

A sponsorship means that any contribution made by ALSA either in cash or in kind, for an event arranged by a third-party as a compensation for advertising ALSA brand.

All sponsorships shall be transparent, by writing and for legitimate corporate objectives and proportionate -not excessive- against the pressure made by the host of the event.

10. PROCEDURE FOR WHISTLE-BLOWING HELPLINE CHANNEL

ALSA is committed to promote a working environment where employees feel free to communicate and report any situation or event of concern to them, or that they consider important for the Group.

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In this sense, if any ALSA employee has reasonable suspicions of any conduct, action or omission that violates the This Code of Ethics, they may, as a first step, seek a response to any doubts or questions they may have or raise a complaint with their direct supervisor or the Compliance Committee.

If for any reason an employee does not deem it appropriate or possible to ask for help from either of these sources, the employee may raise their question/doubt and/or complaint using our HELPLINE system.

The HELPLINE is also available for all the stakeholders.

In order to increase confidentiality of the system, ALSA has decided to outsource the management of the helpline that will be receiving the alerts and hired an external supplier specialised in this type of service. Alerts shall be dealt with in a safe environment by a limited number of the supplier's employees, who have undergone specialist professional training.

ALARES SOCIAL CEE S.A. (ALARES) is the company managing the phone number where employees may report any situation or behaviour violating the provisions established in this document.

People having reasonable signs or suspicions whatsoever about any irregular conduct or behaviour against the current regulation or law, or against any of the provisions set in this Ethical Code, will report the potential irregularity seen through the HELPLINE telephone channel. The telephone lines are as follows, depending on the country in which the caller is located:

- Spain: 900.901.427
- Switzerland: 0041800321016
- France: 003342870150
- Morocco: 0801020304

This helpline is free of charges and is available on working days from Monday to Friday from 9am to 2pm.

ALSA will protect the identity of every person using the HELPLINE Channel, according to the resolution of the case and in accordance with the legislation into force. In any case, the identity of the informant shall be treated as confidential information and under no circumstances shall his or her identity be disclosed to the reported person or to third parties. In any case, anonymous

Ethical code (P-CP-01)

communications are permitted in the event that the informant does not wish to provide identifying information.

The communications received through this line will be reported to the Compliance Committee.

Upon receipt of a report from the external supplier, the Compliance Committee will conduct the appropriate analysis and investigation, as well as the appropriate response to be made in a timely manner.

The Compliance Committee is also responsible for overseeing any corrective actions, which may include disciplinary proceedings, in accordance with national regulations.

As soon as any communication has been received, the Compliance Committee shall notify any person implicated in order to enable that person to exercise his or her rights, including his or her right of defence, without delay. However, the Compliance Committee has the right to take precautionary measures, for example, those necessary to prevent the destruction of evidence in connection with the alert, before notifying the person concerned.

The Compliance Committee shall communicate without delay to the person who sent the communication the results of the investigation.

The Human Resources Service shall be responsible for deciding whether to initiate disciplinary proceedings against the offender on the basis of the outcome of the investigation.

In the event that the investigation shows that the complaint was made unjustifiably or undertaken for improper motives or in bad faith or without a reasonable and probable compromise, the Compliance Committee may take disciplinary action against the complainant.

11. DISCIPLINARY POLICY CONSEQUENCES OF VIOLATING THIS ETHICAL CODE

Without prejudice to the criminal effects of practices whose existence has been proven to be true, the identification by the Compliance Committee of conduct that is typified in the applicable labour legislation (Workers' Statute, Collective Bargaining Agreement or Award, etc.) as liable to sanction, shall imply the

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initiation by the Human Resources Division of the relevant disciplinary process against the person or persons whose involvement in such conduct has been proven.

This process will begin with the opening, when necessary, in accordance with the reference standard, of the corresponding file, and after its processing, if appropriate, the labour sanction will be applied in accordance with the law and internal organisational criteria. The Company has zero tolerance to any violation to the Code. Actions or omissions that are serious or very serious infringements of the Code provisions may be considered as labour infringements, and be penalised as such according to the classification and graduation of them, regulated in the Collective Bargains applicable, or under the current legislation.

Any violation of the Code may entail, as well, the non-compliance with the current legislation, so the offenders may be declared as such from the civil, criminal and/or administrative point of view.

In any case, the Human Resources Division shall meet all legal guarantees.

12. NON-RETALIATION POLICY

The Company values the assistance of employees who choose to report potential wrongdoing and will take steps to protect employees who, in good faith, have reported through the Internal Alert Process (HELPLINE) or through any of the means available to employees an illegal situation or wrongdoing protected by this Code, even if such statements or disclosures prove to be inaccurate.

ALSA has zero tolerance with any retaliation behaviour against an employee reporting a problem in good faith and/or helping in the investigations of potential infringements or violations of this Code. By good faith it is understood an action made without malice, without looking for personal gains and with substantial grounds to believe in its authenticity.

13. PROCESSING OF INFORMATION DUTY OF SECRECY AND CONFIDENTIALITY

The company ensures the compliance with national and European regulations applicable in due time.

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In the case of Spain, we comply with Organic Law 3/2018, of 5 December, on the Protection of Personal Data and guarantee of digital rights, and specifically the obligation of secrecy and confidentiality, incorporating the appropriate technical and organisational measures to ensure a level of security appropriate to the risk, all of this, to prevent alteration, accidental or unlawful loss or alteration of data, unauthorised communication or access to such data, taking into account the state of technology, the nature of the personal data stored and the risks to which they are exposed, whether from human action or from the physical or natural environment, and observing at all times the duty of confidentiality and professional secrecy imposed by current legislation on data protection.

The collection, use, processing and storage of customers' personal data are carried out in such a way as to guarantee, at all times, the right to privacy and compliance with current legislation on the protection of personal data.

In order to be able to defend his or her interests properly, the data subject shall be informed as soon as possible of the facts complained of, the recipients of the information, the department responsible for the system and his or her data protection rights.

The data shall be deleted within a maximum of two months after the end of the investigations if the facts have not been established. In the event of legal proceedings, the data shall be kept for as long as necessary for the exercise by the carrier of its rights in court.

To exercise the rights of access, rectification, deletion, limitation of processing, or opposition, as well as the right to data portability; if applicable, you may send a letter to ALSA GRUPO, S.L.U, Calle Josefa Varcárcel, 20, 28027, Madrid or to the e-mail address asesoria@alsa.es, attaching, in any case, for the exercise of the right requested, a photocopy of your ID card or equivalent document valid in law that allows you to prove your identity. Also, if you consider that your data have been treated improperly, please send an e-mail to the Data Protection Delegate (dpo@alsa.es) or file a claim to the Spanish Data Protection Agency, Calle Jorge Juan, 6, 28001, Madrid.

14. COMMUNICATION AND CASCADE OF THE ETHICAL CODE

The Management Division of the Company shall communicate and cascade to ALSA employees, directors and administrators this Ethical Code. Also, this Ethical

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Code is available for the members of the Group, as well as for the business partners, as it has been published in the corporate website of the Group (<https://www.alsa.es/sobre-alsa/codigo-etico>).

15. APPROVAL, UPDATE AND ENTRY INTO FORCE

The Ethical Code was approved by the ALSA CEO in 2010, entering into force on 1st December 2011. The code was updated, and approved on 21 December 2016, and entering into force on 1st January 2017. In addition, a new update was added to this in December 2018, entering into force in January 2019.

This version of the Ethical Code was approved by the Compliance Committee on 22 September 2021.