



Code of Conduct

Index

- 1. Purpose**
- 2. Scope**
- 3. The company's values**
- 4. Corporate culture**
- 5. Development of corporate culture values and principles**
 - 5.1 Compliance
 - 5.2 Guiding principles of conduct
 - 5.3 The principle of integrity, diversity and equality
 - 5.4 Protection of human rights
 - 5.5 Loyalty and conflicts of interest
 - 5.6 Prohibition of corrupt behaviour
 - 5.7 US foreign corrupt practices act / Political contributions
 - 5.8 Gifts and entertainment
 - 5.9 Using e-mail and mobile devices
 - 5.10 Prevention of money laundering and terrorist financing
 - 5.11 Protection of personal data
 - 5.12 Antitrust
 - 5.13 Nondisclosure: principles inherent to industrial & intellectual property and processing of confidential and/or classified information
 - 5.14 Principles inherent to workers' rights: the four fundamental principles and rights in the workplace
 - 5.15 Occupational health and safety
 - 5.16 Respect for the environment
 - 5.17 Engagement with external stakeholders
 - 5.18 Development of other activities
- 6. Monitoring and control**
 - 6.1. Code of conduct monitoring committee
 - 6.2. Communication
 - 6.3. Whistleblower channel
 - 6.4. Administration, compliance and exclusions to the code of conduct
- 7. References**
- 8. Validity**



1. Purpose

Honesty, integrity, efficiency, transparency and professionalism of employees, officers and directors of the Cox Group group (hereinafter "Cox Group", "the Group", "the company" or "the organisation") is critical to maintaining the good reputation and the success of the company.

The goal of the Code of Professional Conduct is to promote open and transparent professional rigour, setting a behavioural standard applicable to the entire workforce, without exception. It therefore represents an express statement of values, principles and guidelines of conduct that should guide the behaviour and consolidate the culture of everyone in the group in the performance of their professional activity. These shared values are to be found in the historic core of Cox Group's corporate culture, and are therefore not unfamiliar, imported or imposed, and they are followed and promoted from the company's governing bodies down to each employee, exemplified by the example of senior management.

The Code guides the relationships of all Cox Group employees with stakeholders, sharing the corporate values that form part of the business ethics culture of the group.

In addition, as the Code aims to promote professional ethical behaviour, it provides for monitoring and control mechanisms that ensure compliance with the code. Cox Group has a Compliance programme and a Compliance unit that includes the Code of Conduct Monitoring Committee to ensure compliance.

2. Scope

This Code of Conduct governs the working actions and relationships of employees, officers and directors of Cox Group with all its stakeholders (customers, prospective customers, employees, rival companies, public administration, government officials, persons of special significance, the media, society, shareholders, suppliers and all other persons or institutions with which



the company has contact). These relationships are essential for the sustainable success of the organisation. In addition, Cox Group will promote and encourage any professional, partner or employee, or organization linked to the company to have standards of conduct that are similar to or consistent with this Code.

The Code will be notified personally to all Directors and Managers who will accept written responsibility for compliance with the same. In this regard, the obligation for employees to comply with the Code of Conduct will be set out in their employment contract at the time of recruitment (or in a separate document that evidence this). In this respect, employees will have a copy of the same.

This Code of Conduct refers to Cox Group S.A. and each of its subsidiaries.

3. The company's values

The World needs sustainable and innovative solutions for sustainable development. This approach determines the values and the hallmarks of the company.

Cox Group's management and business model are based on the following values:

- **Integrity:** Cox Group must operate in an honest and consistent manner in all the actions it carries out, both within the organisation itself and in the communities in which it operates;
- **Legality:** each action undertaken by the company must be protected by prevailing legality (positive framework) and in accordance with the will to comply (compliance ethics), which ensures the security of its actions and reduces risks;
- **Professional rigour:** the implication and service vocation in all activities performed by the company are essential for the organisation's success;
- **Reliability:** discretion and prudence govern Cox Group's relations with stakeholders, which is fundamental in establishing associations of trust and



maintaining communication and relationship between the organisation and its environs; and

- **Quality:** excellence materialises itself in all of the products and services offered by the company.

4. Corporate culture

Cox Group considers its corporate culture to be a key asset, as it defines the way in which the company does business, establishing its Common Management Systems (CMS) that regulate, control and register all the organisation's processes, from start to finish, which provides the organisation with security, efficiency and control in the management, integrity and traceability of its processes. These are structured around shared values that are the historic core of the Cox Group's corporate culture, and are therefore not unfamiliar and are followed and promoted from the governing bodies of the company down to each employee, exemplified by the example of senior management.

The qualification of breaches of the Common Management Systems falls to the Board of Directors, by delegation to its chairman, executive committees or, where appropriate, to the department delegated. In any case, breaches referring to those areas with a direct impact on the result of the activity or in the assumption of uncontrolled risks will be considered a very serious infringement in professional performance.

There is zero tolerance regarding the breach, nonfulfillment or omission with regard to each and any of the company's policies and values



5. Development of corporate culture values and principles

5.1 Compliance

Compliance with the law is not just an external requirement and an obligation for the the company and its staff. The law provides security in the activity and reduces business risks. Any action, through act or omission that implies a violation of the law is expressly and strictly forbidden. If in doubt about the legality of any action, you must consult the Director of Regulatory Compliance beforehand.

Each employee is personally responsible for being aware of the regulatory framework that applies to the activity they perform, without prejudice to receiving the appropriate advice and training, and is responsible for their actions within the activity of the company. The aim is to comply with each standard applicable or which has been voluntarily assumed (positive framework) but especially the willingness to comply (compliance ethics) beyond the letter of the law to avoid conduct which although it falls within the scope of the law may be harmful or abusive for the community, stakeholders, the environment or which does not respond to the corporate governance and social responsibility criteria established by Cox Group. This predisposition to compliance involves personal willingness to comply, helping employees to comply, and non-acceptance under any circumstances of non-compliant conduct.

5.2 Guiding principles of conduct

In its employment, commercial and social practices, Cox Group assumes and adapts the professional actions of its employees, officers and directors to the United Nations Universal Declaration of Human Rights and its protocols, the International Agreements approved by this international organisation and by the International Labour Organisation (ILO) on social rights, as well as the principles of the United Nations Global Compact on Business Leadership. The company shares and subscribes each point of the document of the United Nations



Convention against Corruption, which was approved by the General Assembly of the UN on 31 October 2003 and which aims, *inter alia*, to:

- Promote and strengthen measures to prevent and combat corruption efficiently;
- Promote, facilitate and support international cooperation and technical assistance in the prevention of and fight against corruption, including in asset recovery; and
- Promote integrity, accountability and proper management of public affairs and public property.

5.3 The principle of integrity, diversity and equality

The company has an explicit commitment to equal opportunities and non-discrimination for any reason. These principles are expressly contemplated and declared in the various policies of the organisation (recruitment, selection, training, performance evaluation, promotion, remuneration, working conditions, reconciliation, prevention of harassment, etc.). It is therefore a fundamental standard and all employees must act rigorously with honesty, respect and professionalism.

There is a protocol for reporting harassment at work in order to address any situation that may be considered discriminatory.

Each employee, officer and director must be bound to observe fair practices and to comply with these principles with customers, suppliers, other companies and other employees of Cox Group.



5.4 Protection of human rights

To ensure protection of the rights of its employees, said employees fall within the scope of supra-business employment regulations, regardless of the nature of their activities or the countries where they are performed. In addition to the legal protection of each country, the regulatory coverage takes on special importance thanks to the collective bargaining agreements in the sector, the territorial ones or the company's own agreements signed with its workers, the unitary representatives or unions, as appropriate.

5.5 Loyalty and conflicts of interest

A conflict of interest arises when the private interests clash in full or in part directly or potentially in any way with the interests of Cox Group (set out in this Code). Each person bound by this Code is expected to avoid all situations that might lead to a substantial actual or potential conflict between their own interests and their duties and responsibilities as an employee, officer or director of Cox Group. Employees, officers or directors that have questions or concerns about a potential conflict of interest should contact the Secretary of the Board or, failing that, the Compliance Officer. Cox Group's

Internal Code of Conduct in issues of the Securities Market specifically regulates some of these issues.

All company members have a duty to ensure the reputation of the company and strengthen both its image and good name.

Any employee, before agreeing to act as a director, officer, consultant or advisor for any other business organisation must notify his or her immediate supervisor.

5.6 Prohibition of corrupt behaviour

Cox Group has mechanisms and procedures to prevent and detect fraudulent and corrupt practices. These mechanisms are incorporated in the Common Management Systems, which are updated continuously and guarantee the



balance between the best business opportunities and proper risk management. Furthermore, the company has adopted a System of Compliance in Anticorruption Matters to disclose its business compliance policy to all employees and their environment, and to promote lawful conduct, as well as to prevent, detect and penalise acts or omissions, including preferential treatment and/or peddling influences, that could represent a breach and the responsibility stemming therefrom.

It requires all employees to act in full compliance with the anticorruption laws or standards applicable or undertaken to ensure that Cox Group maintains the trust of customers and authorities, to protect its businesses from any breach and the responsibility that entails and thus safeguard its reputation.

All company employees receive regular information and training on procedures to be complied with and the reporting channels if they detect irregular activities in this area.

5.7 US foreign corrupt practices act / Political contributions

Apart from the provisions of this Code of Conduct, the Compliance System in the Field of Anticorruption and other concordant Cox Group policies, employees working with any private organisation or with the Administration of any country have an obligation to

know, understand and observe the applicable laws and regulations. In the event that a body of the national, state or local Administration has adopted a policy that is more restrictive than that of Cox Group in this field, Cox Group employees and representatives must comply with that more restrictive policy.

Cox Group is subject to global laws, in particular the U.S. Foreign Corrupt Practices Act ("FCPA") and the UK Bribery Act of 2010 (hereinafter the "UK Bribery Act"), which are the benchmark laws in this area. The FCPA makes it a crime for companies and their officers, directors, employees and representatives to pay, promise, offer or authorise the payment of anything of value to any foreign official, foreign political party, officials of foreign political



parties, candidates for foreign political office or those in charge of international public organisations, in order to obtain or retain business. Payments of this nature are strictly against Cox Group's policy even if the refusal to make them may mean that Cox Group is unable to take advantage of a business opportunity.

The FCPA also requires companies to maintain accurate books, records and accounts and to devise a system of internal accounting controls that is sufficient to provide reasonable assurance that, among other things, the books and records of the company reflect, in reasonable detail, transactions and dispositions of its assets.

The UK Bribery Act has a similar range, but with a more restrictive criterion, as it also criminalises the corruption of private sector businesses.

Cox Group will not give or encourage anyone to give inducements of any kind to any government employee or employee of the private sector, or to any supplier subject to a governmental or nongovernmental contract or subcontract, in order to achieve any contract or business advantage.

5.8 Gifts and entertainment

Gifts and entertainment activities may be common practice in some jurisdictions that are used in many sectors and countries to strengthen commercial relations. Cox Group's position is the same in all countries: it will not accept or provide any gift or favour, nor any entertainment activity, if this obliges or appears to oblige the person that receives it, even if this is not prohibited. It is not permitted to ever receive or give gifts of cash or highly liquid assets.



Cox Group employees may accept or give gifts, favours and entertainment activities only if they meet the following criteria:

- If they do not contravene the law or the policy of the other party.
- If they are consistent with customary business practices in the country or sector.
- If they are reasonably related to business relationships.
- If they are consistent with existing business guidelines.
- If they cannot be construed as bribery or improper influence; and
- If they do not violate the values or commercial ethics of Cox Group in any other way.

For proper compliance with these requirements, prior authorisation is required for the acceptance or granting of:

- Gifts whose value exceeds 50 USD or equivalent; and
- Invitations to any kind of congress, business trip or event of any kind paid on behalf of the promoter.

Any gift that does not meet the criteria set out above will be returned immediately. In the event that it cannot be returned, it will be handed to the CSR Department, which will use it for social purposes. In this regard, the CSR Department must have documentation supporting the use made of this gift.

In addition, the following practices are to be followed for the hospitality expenses offered:

- In no event can freely available cash be included as part of the hospitality;
- Not to make cash advances;
- Hospitality expenses must be paid directly by Cox Group and not by intervening third parties;



- Whenever the situation permits, expenses (hotels, restaurants) will be paid directly, rather than reimbursing the recipient. In the event of reimbursement, the utmost care will be taken to keep the appropriate receipt;
- The nature of the event/invitation will be properly documented, either in the settlement of expenses, or accounting for the respective invoices;
- Extending an invitation to companions must be justified by the nature of the event;
- The invitation cannot be conditioned to the performance of any action on behalf of Cox Group;
- The communications and/or invitations are to be sent to the business/institutional management and not to personnel; and
- In case of doubt, contact the Regulatory Compliance Department or Legal Services.

5.9 Using e-mail and mobile devices

Email, corporate systems, the information stored in them, as well as electronic devices (PCs, laptops, mobiles, tablets, etc.), are the property of the organization, which makes them available to the employee, solely and exclusively for carry out their professional duties, and their personal use must be avoided.

The organization will ensure the proper use of devices, email and any other corporate information system. It may establish the limitations to its use that it considers pertinent to provide adequate protection, and will carry out the controls that are considered necessary, without prior notice, in the event of indications of a crime or breaches of this Code, always within the requirements established for this purpose. the applicable legislation.

The fraudulent or abusive use of these resources, the sharing of information with unauthorized third parties or its download for illegitimate purposes, will be sanctioned and punished by the company, taking the pertinent legal actions.



The organization will activate mechanisms that verify and guarantee the identity and privileges of employees who try to access systems and corporate information, such as double authentication factor or any other technical measure that is considered appropriate in the future. The employee may not refuse to facilitate the application of measures designed to protect the integrity and security of corporate systems and the protection of information.

Employees must return all the devices made available to them, once the employment relationship with the organization has ended. If not, the company will take appropriate legal action.

5.10 Prevention of money laundering and terrorist financing

Cox Group voluntarily accepts the principles and obligations set out in national and international regulations applicable in issues of prevention of money laundering and terrorist financing. Accordingly it has voluntarily developed a Compliance Programme in this field, for the purpose of establishing the appropriate procedures for compliance in collaboration with the regulations on prevention of money laundering and terrorist financing as well as to impede or prevent the company being used for these purposes.

It is aimed at developing procedures and controls to verify, prevent and impede collaboration with persons engaged in laundering activities or being used by them for those purposes.

Money laundering includes, *inter alia*:

- The conversion or transfer of property (of any kind, whether tangible or intangible, liquid or not, or even electronic movements) with knowledge of its origin in criminal activities in order to conceal their origin or ownership;
- The concealment of their origin, location, movement or ownership of such property;
- The acquisition or use of such assets and their disposal; and
- Participation in the foregoing activities.



Terrorist financing includes, *inter alia*:

- The supply, storage, distribution of funds or property with the intent of being used by their holders to commit terrorist offences, whether directly or indirectly.

5.11 Protection of personal data

Cox Group has adopted a Specific Compliance Programme in Protection of Personal Data for the purpose of informing its business compliance policy to all employers and their environs, and to promote lawful conduct avoiding and investigating any acts or omissions that could represent a breach and the liability arising therefrom.

All employees are required to act in full compliance with the Data Protection laws to ensure that Cox Group maintains the trust of customers and authorities, to protect its businesses from any breach and the liability that entails and thus safeguard its reputation.

Most countries and jurisdictions have mandatory regulations or guideline standards on market practices regarding the holding and use by a company of personal data of natural persons.

Employees are prohibited from the following conduct:

- Holding or capturing data without the consent or with the challenge of the affected party;
- Non-consented transfer of data;
- Manipulation of personal data;
- Dissemination or publication of data outside of the context; and
- Creation of user profiles based on previously obtained data.

Breach of Data Protection Laws can have severe and personal consequences. In most countries, companies declared culpable of such infringements may be subject to criminal or civil sanctions, including fines and prison sentences.



5.12 Antitrust

Cox Group has adopted a Specific Anti-trust Compliance Programme that requires all employees to act in complete fulfilment with the Anti-trust laws applicable to guarantee that Cox Group maintains the trust of customers and authorities, to protect its businesses from any breach and the liability this brings with it, and thus enhance its reputation.

All Cox Group employees must compete dutifully in the market, without any misleading advertising on the company's activity, and without accepting practices or conduct that are deceptive, fraudulent or malicious and which represent market advantages. Further details on what employees are allowed and not allowed to do can be found at "Anti Trust Compliance Program".

5.13 Nondisclosure: principles inherent to industrial & intellectual property and processing of confidential and/or classified information

Information regarding Cox Group or its stakeholders (employees, customers and suppliers) that is not public is considered confidential. This information must be used solely to satisfy Cox Group's business targets, and this confidential information cannot be shared with anyone outside the company, including family and friends, or any other worker who does not require this information to perform their duties. The obligation to keep all information strictly confidential will remain in force once their employment relationship with Cox Group has concluded.

For merely illustrative purposes, a list of confidential information is shown hereunder:

- Substantial non-public financial information regarding Cox Group or any of its subsidiaries or affiliates;
- The Common Management Systems;
- Commercial or technical information, such as programmes, methods, techniques, compilations or information that is valuable through not being in the public domain;



- All rights of any invention or process developed by an employee through the use of facilities or commercial secrets of Cox Group, as a result of any of the company's work, or related to the company's businesses, which belong to Cox Group or which are assigned to this party by law;
- Exclusive information, such as lists of customers, for example; and
- In general, sharing any type of information of the group whose dissemination or disclosure could affect the interests of Cox Group is contrary to this Code of Conduct.

All public communications and media releases that affect Cox Group must first be approved by the Board of Directors, by the Chairman of the Board of Directors, or the Department previously delegated with this duty.

Buying, selling, trading or otherwise taking part in transactions that affect the shares of Cox Group, when one has possession of substantial information concerning the company that has not been disclosed to the public at large and when such disclosure could have an impact on the organisation's share price is contrary to this Code of Conduct and also illegal.

Buying, selling, trading or otherwise taking part in transactions that affect the shares of any other company when one has possession of similar substantial information concerning the company that has not been disclosed to the public at large. Any questions concerning the legality of undertaking an operation with Cox Group shares (or those of another company) should be addressed to the secretary of the Board of Directors or the Compliance Office.

5.14 Principles inherent to workers' rights: the five fundamental principles and rights in the workplace

Workplace discrimination: the elimination of discrimination in terms of employment and occupation, combating any threat to achieve equal opportunities, any situation of violence and harassment, including violence and harassment based on gender. Human rights are broader than just the rights of employees in the workplace. The anti-discriminatory policies are key requirements of the agreements and of the international social laws and



regulations. The issue of discrimination is also addressed in the Fundamental Conventions 100 and 101 of the ILO. We need to have an effective control system to ensure compliance in all operations of the reporting organisation. Stakeholders strive to ensure that such policies and the control of these are efficient.

Freedom of Association and collective bargaining: freedom of association and freedom to join a union and the right to collective bargaining. Freedom of association is a human right, as defined in international declarations, especially in the Framework Conventions 87 and 98 of the ILO. Collective bargaining is an important form of engagement with stakeholders and is particularly relevant for the guidelines in writing reports. This undertaking helps to build institutional structures and many believe that it helps towards a stable society. Together with corporate governance, collective bargaining forms part of the general framework that helps towards responsible management. It is an instrument used by the parties to facilitate collaborative efforts to enhance the positive social impact of an organization.

The elimination of forced or obligatory labour: it is considered a fundamental human right not to be subject to forced or unconsented labour, as stipulated in the United Nations Universal Declaration of Human Rights and regulated in the Fundamental Conventions 29 and 105 of the ILO. This type of work can take many forms and the data provided will indicate the challenges of the reporting organisation to help abolish forced or unconsented labour.

The effective elimination of child labour: the abolition of child labour is a key principle and one of the goals of legislation and of the main declarations on human rights, and is covered by Conventions 138 and 182 of the ILO. The existence and effective implementation of policies on child labour represent basic expectations of socially responsible conduct.



Safe and healthy work environment: the effective protection of the right to health and safety at work. The origins of the principle of a healthy and safe working environment go back to the Preamble of the original ILO Constitution of 1919, which demanded the urgent protection of workers against diseases, whether occupational or not, and against work accidents. The consensus on the fundamental nature of safety and health at work was evident in the Resolution on the inclusion of a safe and healthy working environment in the ILO framework on fundamental principles and rights at work, adopted by the International Labor Conference in June 2022.

5.15 Occupational health and safety

At Cox Group, the first and most important asset we have are our people, and for this reason, our commitment to the Health and Safety of all of us who are part of the company is maximum, this approach being deeply integrated within the organization.

In this sense, our Health and Safety policy revolves around 5 fundamental pillars: Integration, management leadership, training, continuous improvement and legality.

Likewise, Cox Group has an occupational health and safety management system duly certified under the ISO 45001 standard and periodically audited.

For all these reasons, all employees and other interested parties of the company must know and comply with the applicable health and safety regulations, integrating the preventive function in the exercise of their activities, and promoting the creation of a safe and healthy work environment.



5.16 Respect for the environment

The business model and strategy of Cox Group are designed around creating innovative technology solutions for sustainable development. Thus, excellent environmental management and combating climate change are intrinsic to the business itself and are present in all activities and areas.

In 2015 Cox Group issued a statement of environmental policy that guides its present and future actions in terms of sustainability, based on the following principles:

- Integrating environmental management into the company's corporate strategy, defining guidelines for implementing environmental management systems in all its activities;
- Guaranteeing in all its activities the commitment to environmental protection, guiding them beyond compliance with prevailing legislation and taking into account the requirements of customers and other stakeholders;
- Encouraging the efficient use of resources and promoting the purchase of recycled and/or certified materials;
- Reducing impacts on the environment in the life-cycle of products and services produced by the company, including the supply chain and production of raw material;
- Promoting proper waste management focusing on the reduction at source and encouraging the recovery of such waste to the extent possible;
- Promoting the adaptation and reduction of the effects of climate change through specific programmes and implementation of an internal price for coal;
- Promoting the control and action on the set of environmental factors and indicators for improving the global footprint; and
- Encouraging collaboration with other organisations to achieve greater awareness and sensitivity for environmental protection and sustainable economic development.



5.17 Engagement with external stakeholders

Cox Group's relationship with its external stakeholders (customers, suppliers, shareholders, society and communities where the company carries out its activities) takes place within a context of transparency and trust based on two-way, continuous and accurate communication.

Customers: Reliability and management excellence are hallmarks of Cox Group. The company's raison d'être is tied to its ability to bring to market products and services that meet and exceed customers' expectations.

Employees must undertake to treat customers in a comprehensive manner, according to the principles of this Code and in accordance with prevailing regulations of the country, and always seeking quality and excellence in the products or services offered.

Supply chain: Cox Group considers its suppliers and subcontractors to be essential and vital for development of the business and to be able to successfully compete in the market. Accordingly, all employees of Cox Group must perform objective and transparent selection processes, to avoid any conflict of interest or favoritism in procurement, and base themselves on criteria of quality, costs and compliance with deadlines.

In an effort to run its business with the utmost integrity and the highest respect for those who may be affected by its activities, Cox Group requires all suppliers with whom it operates to adhere to the Social Responsibility Code (SRC) for suppliers and subcontractors, which contains eleven clauses based on the principles of the UN Global Compact and inspired by the international standard SA 8000. With the signing of this agreement, the supplier is not only committed to ensuring that its activities are based on the code, but also to have full availability to undergo an audit or other inspection by Cox Group to verify compliance with the principles.

There is also an ethical and conduct manual for employees and subcontractors on the premises of the company.



Community: Cox Group promotes the development in those communities where it is present, providing them with support, investing in education and culture, protecting the environment and promoting the respect of human rights from its catchment area.

Part of the commitment to the community translates into donations or sponsorships, which in order to comply with maximum transparency and integrity must satisfy the following requirements:

- Possess the appropriate authorisations reflected in the Common Management Systems.
- Be awarded to enterprises that guarantee the proper use and management of the economic resources provided;
- Conduct timely monitoring of the final destination of the donation by obtaining all receipts (bills, till receipts, etc.) to ensure proper use of the financial contribution and to ensure it is correctly reflected in the accounting records; and
- Allocate the authorised economic contribution to an authorised social purpose, preventing it from being used to conceal an improper payment, a bribe, facilitation payment or any other prohibited conduct related to corruption.

Shareholders: Cox Group focuses the company's management on creating value for its shareholders, through the utmost transparency. Accordingly, it undertakes to report regularly with regard to all information in its possession and which may be necessary to ensure that the financial reports and disclosures of Cox Group to be submitted to the CNMV (National Securities Market Committee) or other governing bodies of the stock exchange or the information included in other public communications are full, truthful and accurate.



5.18 Development of other activities

Employees and managers may perform other activities outside the group, provided that:

- They do not have an exclusive contract;
- The activities performed do not compete directly with any activity undertaken by the group; and
- The activities are not detrimental to the performance of their duties within Cox Group.

6. Monitoring and control

6.1 Code of conduct monitoring committee

The Code of Conduct Monitoring Committee comprising the Compliance Officer, the Director of Internal Audit and the Director of Corporate Social Responsibility has the following duties:

- Promote the dissemination, knowledge and compliance with the Code of Conduct among all members of the organisation and its stakeholders, fostering a culture that encourages ethical behaviour;
- Advise on the interpretation of the Code, guiding actions in the case of any doubts or queries;
- Propose mechanisms and channels of internal and external communication so that both employees and other stakeholder can report on any facts relating to compliance with the Code;
- Propose actions and control mechanisms to promote compliance with the Code, and to prevent and detect illegal behaviour;
- Ensure confidentiality of complaints received, guaranteeing no reprisals against those complaints received in good faith;



- Analyse improvement proposals received on the Code, possible regulatory changes or new developments in order to have the code fully updated and adapted pursuant to best practices of good governance and corporate integrity; and
- Inform the governing bodies of the company of the actions taken and results of the Code of Conduct Monitoring Committee.

Cox Group reserves the right to carry out checks within prevailing legislation, in order to verify the application of this standard and prevent activities that may affect the legal compliance, nondisclosure, the integrity and availability of information.

Accordingly, Cox Group has a Regulatory Compliance Unit, which will have the necessary authority, resources and means, in coordination with the Internal Audit Department, to introduce and enforce internal control measures of the Regulatory Compliance Model that are appropriate to detect, prevent and avoid the perpetration of criminal, civil, commercial, administrative and tax offences attributable to the artificial person, as well as the appropriate reaction in the event of any that have possibly occurred.

6.2 Communication

Cox Group requires its employees, officers and directors to have a direct and two-way communication with their supervisors, managers and other appropriate personnel to report and discuss any known or suspected criminal activity affecting the activity of both Cox Group and its employees. If during the course of their employment relationship they become aware of any activity of behaviour in this regard they must report said infringements of the laws, voluntarily assumed standards or this Code of Conduct following the protocol established for this purpose and which is summarised in the following point (also available at www.coxCox Group.com). Reporting the activity will not subject the employee to disciplinary action unless the report is deliberately false. All reports will be treated confidentially and will be fully investigated.



This Code of Conduct requires internal and immediate reporting of any breach thereof, as well as all illegal conduct. The procedure set out in the Whistleblower Channel must therefore be followed.

6.3 Whistleblower channel

The whistleblower channels are a fundamental part of Cox Group's commitment in its fight against corruption in all those practices that contravene the voluntarily assumed laws or standards, as they represent a mechanism through which all stakeholders of the company can anonymously report any irregular conduct they detect during the performance of their professional tasks.

Cox Group's two whistleblower channels have been set up in accordance with the specific requirements of the Sarbanes-Oxley Act.

- **Internal:** available for all employees to report complaints or claims related to the financial statements or other reports, accounting matters, internal controls over financial reporting, auditing matters or breaches of the Code of Conduct.
- **External:** designed for anyone outside the company to report irregularities, fraudulent acts or which are contrary to the Code of Conduct. This is available on the Cox Group website.

6.4 Administration, compliance and exclusions to the code of conduct

This Code of Conduct will be administered and supervised by the Code of Conduct Monitoring Committee under the responsibility of the Board of Directors.

All employees, officers and directors of Cox Group must comply with the specifications of this Code of Conduct; in exceptional circumstances, situations may arise where a waiver or exception may be agreed. The Committee will propose these singularities to the board of directors depending on each case.



Serious breach of this Code of Conduct may result in disciplinary action, including termination of employment, depending on the nature and severity of the offence.

The Code of Conduct will be distributed to all employees of Cox Group and will remain posted on the company's website (www.Cox Group.com).

7. References

- Universal Declaration of Human Rights
- International Labour Organisation (ILO)
- Health and safety regulations (OHSA18001)
- US Foreign Corrupt Practices Act
- Good Governance Code of Listed Companies (CNMV - Spanish National Securities Market Commission)
- Anticorruption ethics programme and compliance for businesses: UNODC-practical guide
- Guide for listed companies in Compliance Reporting and Good Governance-International Transparency
- ISO 37001 Antibribery management systems
- UNE-ISO 19600 and 19601 Compliance management systems, and criminal systems
- Organic Law 1/2015, of 30 March, on the Criminal Code.



8. Validity

This Code of Conduct will remain in force unless the Board approves its update, review or repeal. The current version, September 2023 revision, is the current one.

It will be reviewed and updated by the Code of Conduct Monitoring Committee with the frequency specified by the Board of Directors and at least every year, taking into account any proposals or suggestions made by employees or stakeholders, and taking into account commitments in corporate integrity, transparency, accountability and good