

# Lontana Group

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## ETHICAL CODE OF CONDUCT

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*Our conduct is what makes the difference*

## **SCOPE OF APPLICATION**

The action principles and behavioural guidelines in this Ethical Code of Conduct are applicable to all administrators, executives and staff of Lontana Group.

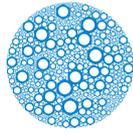
Its scope of application extends to Lontana S.A. and to all the companies in which it has a direct stake or a stake through other companies. Hereinafter, Lontana Group.

All people linked to Lontana Group are required to know and comply with this Ethical Code of Conduct and work towards its implementation and effectiveness.

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\* Code approved by the Board of Directors of LONTANA S.A.  
on 21 May 2021.

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Lontana  
Group

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# MESSAGE FROM THE CHAIRMAN OF THE BOARD OF DIRECTORS

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At Lontana Group we consider it essential to have an Ethical Code of Conduct as part of the Regulatory Compliance System that helps raise the visibility of our culture and our values.

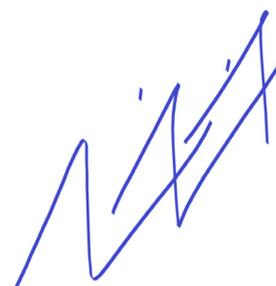
This Code is intended for all the people who make up the Group: shareholders, board members, executives, workers and other associated individuals. Its purpose is to disseminate the guidelines for action that guarantee ZERO Tolerance for risk-taking behaviours and breaking the established rules.

The Board of Directors defines and oversees the Regulatory Compliance System, ensuring it has the necessary resources and promoting its continuous improvement.

The Executive Committee, meanwhile, ensures it is efficiently integrated into the rest of our operating processes.

- Ensuring the efficacy of Regulatory Compliance measures and of this Ethical Code of Conduct.
- Establishing the specific behaviours that must be promoted and those that must be avoided.
- Disseminating our commitment to responsibility and communicating to all workers their obligation to accept, integrate and ensure compliance with this Ethical Code of Conduct.
- Anticipating breaches, expressly prohibiting any behaviour that poses a risk to our assets and to those of our stakeholder groups.
- Supporting all workers through safe and confidential communication channels.
- Making Regulatory Compliance tangible, sharing information that is practical and understandable for all stakeholders.

With this Ethical Code of Conduct we advance towards a more transparent and socially responsible form of management, which is a pillar of Corporate Good Governance and of all the activities carried out in Lontana Group.



**Ricardo García Cámara**  
Chairman of the Board of Directors



# OUR CHALLENGE IN REGULATORY COMPLIANCE

*“To guarantee ethical behaviour in our everyday work, promoting a Culture of Zero Tolerance for breaches”*

## GIVING CLEAR GUIDELINES

Establishing the specific behaviours that must be promoted and those that must be avoided.

## DISSEMINATING OUR COMMITMENT TO ETHICS

Communicating to all workers their obligation to accept, integrate and ensure compliance with this Ethical Code of Conduct.

## ANTICIPATING BREACHES

Expressly prohibiting any behaviour that may pose a risk to our assets and those of our stakeholders.

## MAKING REGULATORY COMPLIANCE TANGIBLE

Disseminating information that is practical and understandable for all Lontana Group stakeholders.



# LONTANA GROUP VALUES



Customer orientation



Focus on results



Excellence



Interest in people



Teamwork



Integrity

*“The Ethical Code of Conduct reinforces our Values”*



# COMPLIANCE WITH THE RULES OF THE SYSTEM

## ACTIVE RESPONSIBILITY

All workers must know all the rules that apply to them and their job, requesting the appropriate updates or training from their manager if necessary.

The rules apply whether working in person or remotely.

In the event of a specific unexpected situation, apply the spirit and purpose of the rules following general criteria.

Anyone who has staff reporting to them or who make decisions on behalf of Lontana Group must also supervise what their teams do.

If there are any irregular circumstances, workers must address them with the reporting structure or the specialised area. They can also use the Ethics channel.

## ETHICS CHANNEL

This channel must be used to report possible risk-taking behaviour.

It is also the best way to clarify any doubts or get advice on situations related to possible risk-taking behaviour, either one's own or that of third parties.

The information provided could lead to an investigation and, if conduct is discovered that breaks the rules of the Regulatory Compliance System, to appropriate sanctions.

The application of criteria of neutrality, equity and confidentiality is guaranteed in investigations.

You can use the Ethics channel at the following email addresses:

- canal-etico@lontana.es (for general issues).
- consejero.canal-etico@lontana.es (to communicate with an independent Board Member for critical issues).

*“Every person is responsible for applying all the legal and voluntary rules established at Lontana Group”*

*“The ethics channel is for informing and being informed”*



# WORK ENVIRONMENT

## OCCUPATIONAL HEALTH AND SAFETY

All workers must ensure their own safety and that of their colleagues, and must know and comply with the general and specific rules applicable to their job position.

They must also inform their manager or ORP of any dangerous situations they are aware of. This includes company employees and third parties like suppliers or subcontractors who are at Lontana Group facilities.

The reporting structure also guarantees that the defined rules are applied and oversees correct prevention management in its area of competence.

## EQUALITY AND NON-DISCRIMINATION

All workers are guided by respectful treatment among colleagues and with third parties.

Decisions and behaviours that discriminate against any person because of their ideology, religion or beliefs; their belonging to an ethnicity, race or nation; their sex, sexual orientation, family situation, disease or disability; their using legal or union representation for workers; their kinship with other company workers; or their using any of the official languages of the Spanish state are not tolerated.

Diversity implies a lack of discrimination and covers all decisions related to the development of one's professional life, including hiring, promoting and training, and in general all working conditions.

## PREVENTION OF WORKPLACE HARASSMENT

Any comment, situation or treatment that involves harassment or intimidation towards any person, man or woman, at any hierarchical level, whether they are an employee of Lontana Group or third parties, is prohibited.

This includes physical, verbal or non-verbal behaviours that are unwanted, irrational or offensive to the person being subjected to them, referring to their job performance or based on sex, religion, race or sexual orientation.

If you become aware of or experience a situation of this type, you must inform your manager or use the Ethics channel, so that the necessary measures may be taken as quickly as possible.

To guarantee confidentiality and rigour in these matters, maximum discretion is required of all who participate in such situations, while they are being managed and afterwards.

The behaviours described above are inadmissible in Lontana Group and will be investigated despite whether or not they are illegal, possibly resulting in sanctions for those involved.

[More information in our Regulatory Compliance Policy](#)

*“Following rules is essential”*

*“We are committed to work relationships based on mutual respect”*



# INFORMATION SECURITY AND PRIVACY

## DUTY OF SECRECY AND CUSTODY

Workers are subject to a duty of secrecy with respect to the information and documentation they come into contact with as part of their job.

This includes Lontana Group's information but also that of third parties such as clients and suppliers.

It is the responsibility of each person to keep custody of this information, in accordance with established directives.

In the event of an incident, such as accidental access to confidential information without authorisation or loss of information, the worker must report it to the IT Department as quickly as possible, so that the appropriate corrective measures may be taken.

## USE OF AVAILABLE DEVICES

The work devices made available to workers are used to contribute to achieving the individual objectives of their jobs.

Their private use is tolerated within the established framework provided it does not jeopardise the assets or condition the interests of Lontana Group.

Workers must follow the established safety instructions, in particular as related to the policy for passwords and downloads of external emails, and the use and custody of mobile phones, external memory devices, laptop computers and any other similar devices.

When justified, the company may access the information contained on these devices, including mobile telephones, computers, external memory devices and email, to perform checks or take necessary measures, always respecting the rights and privacy of people and personal data protection.

## PERSONAL DATA PROTECTION

All workers must know and apply the privacy instructions of Lontana Group, which regulate the use of the personal data of workers and associated third parties, such as suppliers, visitors and customers.

This includes the access, copying, filing or destruction of all personal data and data that are identifying, health-related, economic, include images or signatures, among others.

In general, personal data are processed with the appropriate security and confidentiality, paying special attention to the use and custody of devices, the opening of files in emails, paper copies and respecting restricted access in accordance with permissions.

Any infraction or security breach you become aware of must be reported to the IT Department as soon as possible.

Likewise, workers and third parties can exercise their rights using the channels provided for that purpose. ("Help desk").



# RELATIONS WITH THIRD PARTIES

## CONTRACTS

**Conflict of interests:** Any action or contracting decision at any level of Lontana Group based in the pure personal interest of the person or people from the company who are participating in it, or of third parties with whom they have a personal connection, such as family members or friends, with no consideration for the general interests of the group, is prohibited.

**Minimum requirements. Approval:** Take into account the level of commitment to Regulatory Compliance when contracting suppliers of goods and services, and require evidence and include specific contractual causes as considered necessary.

**Contractual compliance and oversight:** Perform appropriate monitoring of suppliers, saving evidence of this monitoring.

## GIFTS AND ENTERTAINMENT. PREVENTION OF ACTIVE AND PASSIVE CORRUPTION

The workers and other people linked to Lontana Group who are involved in relationships with:

- Customers
- Public officials
- Contracting and overseeing suppliers

comply with and enforce compliance with the specific rules regarding gifts and entertainment.

Pay special attention to situations in which the amount or the nature of these gifts or entertainment could unethically influence the decisions of the customer or public official (risk of active corruption) or of the employees themselves (risk of passive corruption).

## FREE COMPETITION. COMMERCIAL INFORMATION

The information belonging to customers, competitors, suppliers and other third parties is treated in accordance with the principles of free competition, avoiding any unfair practices including the violation of secrets, violation of rules, acts of comparison or inducing employees, suppliers, customers and others to infringe on contractual commitments.

## INDUSTRIAL AND INTELLECTUAL PROPERTY. THIRD-PARTY RIGHTS

The use of third-party images, software and documents must respect their intellectual and industrial property rights.

The development and content of advertising campaigns and publications in general are controlled by access permissions.

[More information in our Anti-Corruption Policy](#)



# SAFE PAYMENTS AND COLLECTIONS

## IDENTIFICATION OF CUSTOMERS AND SUPPLIERS

Workers involved with payments and collections must always follow the specific due diligence requirements, in particular those related to bank account ownership and the operational consistency of customers and suppliers.

## LEVELS OF AUTHORITY. SEGREGATION OF DUTIES.

Workers know and respect the different levels of authority, segregation of duties and circuits of approval for accounting and financial management, reporting any deficiency or possible improvement.

## INTERNAL AND EXTERNAL AUDITING

Accounting and financial operations are monitored by internal and external third parties, placing particular importance on the custody of evidence and compliance with reporting policies, their analysis and the conclusions drawn.



# RESPONSIBILITIES

## FOR REGULATORY COMPLIANCE AT LONTANA GROUP

### WORKERS

- To accept and comply with all the rules, policies and directives in force at Lontana Group.
- To cooperate in detecting risky situations.
- To propose improvements for advancing the Compliance Culture.

### REGULATORY COMPLIANCE BODY

- To drive and handle matters related to regulatory compliance. To develop it, oversee it and improve it.
- To provide expert advice and information.
- To develop actions for promoting an appropriate Compliance Culture.

### MANAGEMENT BODY

- To promote the Compliance Culture.
- To be a role model.
- To provide the necessary resources for an effective model.

***“Breaches of the Ethical Code of Conduct may be sanctioned in accordance with the applicable agreement and other applicable law, consistent with due process.”***

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# FAQs

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## WHAT IS INCLUDED IN REGULATORY COMPLIANCE?

Any conduct at work or using the company's resources that breaks the rules of Lontana Group or generates a risk of non-compliance.

## WHAT TO DO WHEN THERE IS QUESTIONABLE BEHAVIOUR?

1. Act with discretion.
2. Gather the information.
3. Bring the matter to your manager, the specialised area, or use the Ethics Channel directly.

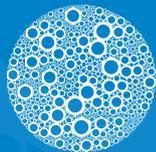
## WHO TO INFORM IF A RULE IS BROKEN?

- A worker who becomes aware of a situation or behaviour is legally required to report it.
- They may report it to their superior or, if they prefer, use the Ethics Channel.

## WHO MANAGES THE REGULATORY COMPLIANCE SYSTEM?

- Every person is responsible for the System, through their behaviour.
- The Regulatory Compliance Committee is the specialised function.
- The Board of Directors is ultimately responsible and the decision-maker.

09/2021



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