

Code of Ethics

CASTELLANA PROPERTIES GROUP



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1. INTRODUCTION

Together, we have managed to position the **CASTELLANA Group**, including **Castellana Properties SOCIMI, S.A. and its subsidiaries** (hereinafter "**Castellana Properties**", the "**Company**", the "**Organization**" or "**CPS**") as a reference in our domestic market and we have had, from the beginning, the support of leading international shareholders in the field of real estate investment, such as Vukile Property Fund Limited and its organization. To achieve this, the ethical behavior of all our employees and also of our partners has proven fundamental. Basic principles and a commitment to our stakeholders have been present at all times and have brought us a solid image as a company. Not only outwardly, but also inwardly, as one of the companies that has been awarded in 2021 with the "Great Place to Work" certification that measures employees' happiness at work.

This commitment is reinforced by a determination to deliver stable and superior profitability wherever possible, while always engaging in responsible business practices.

Castellana's Code of Ethics reflects the above commitments and constitutes, as stated, the basis for the business practice of all the group and has been designed in such a manner that it not only provides useful general guidance for all, but also allows room for interpretation in our various business environments.

The inappropriate behavior of a single professional of the Organization can potentially damage our image and reputation. To prevent and avoid this possibility, we must consolidate our company culture -a culture of commitment- with values and principles based on compliance with the law and Castellana Properties' internal regulations.

In order to consolidate our company culture, in which teamwork, results orientation and strategic vision and operational excellence are so important, we must all know and assume as our own certain common principles that we have attempted to include in this Code of Ethics and which have been approved by the Board of Directors.

We invite you to read this Code carefully and to apply its guidelines in the performance of your duties, thus fostering an environment of respect, integrity and professionalism.

2. AWARENESS AND COMPLIANCE

Staff and external collaborators, where applicable, must be aware of and comply with this Code of Ethics, and cooperate to facilitate its implementation. Should you require advice on how to act in a given situation that may involve an ethical conflict, please consult this Code of Ethics for the most appropriate way to obtain such guidance. If you observe conduct that you believe to be contrary to our values and guiding principles, you should report it using the channels provided by Castellana Properties. CPS is committed to treating all suspected or confirmed contraventions of the Code of Ethics on a case-by-case basis according to their merits and with the highest level of confidentiality.

3. DESCRIBING OUR VALUES AND GUIDING PRINCIPLES

Our values and principles underpin our vision, which reads as follows:

At Castellana Properties -as well as at an international level at Vukile- we strive to be a leading entity, generating sustainable growth in earnings and superior returns for our stakeholders through our portfolio optimization, data-driven asset management, active dealmaking, conservative financial management and the provision of a top-quality experience for our tenants and their customers in our retail portfolio.

Castellana Properties's values are as follows:

- Passions for what we do
- Make a difference as a team
- Act with integrity and transparency
- Shareholder – centric
- Committed with our clients
- Sustainable growth
- Proactive and innovation lovers
- Treasure our relationships

To live these values, we should adhere to the following five guiding principles:

- Regulatory compliance
- Living with integrity
- Transparency, Anti-Corruption and Criminal Compliance
- Acting as custodians of stakeholder value
- Respecting others

4. **SCOPE AND IMPACT OF THE CODE OF ETHICS**

The commitment of all employees and partners is necessary to address the challenges that will undoubtedly arise in Castellana Properties.

Indeed, the Code of Ethics is applicable to all employees, officers, legal representatives and *de facto* or *de jure* directors (hereinafter, the "**Staff**") of Castellana Properties, its divisions and all Group companies, as well as to all those collaborators who are subject to the authority of Castellana Properties SOCIMI, S. A. or who act in its name and/or on its behalf (hereinafter jointly referred to as the "**Persons Subject to the Authority of Castellana Properties**").

It is within our powers to extend, as far as possible, to suppliers or any other person or entity that does business with Castellana Properties, respect for our ethical principles. To that effect, we will not maintain business or commercial relations with entities whose Code of Ethics or Code of Conduct is not, at least, respectful of Castellana Properties' general principles or does not comply with this Code, always taking into account the principle of proportionality and the authority of third parties to commit Castellana Properties with their actions.

In the relationships we establish with suppliers, collaborators and the community in which we carry out our business and activities, we will apply the ethical values herein, which will be accessible to third parties through our corporate website.

This Code of Ethics is intended to develop the principles contained in Castellana Properties' vision and values, and has been prepared taking into account the recommendations on good governance and also the new prevention obligations imposed regarding Criminal Liability of Legal Entities.

Failure to comply with the obligations herein, both in spirit and letter, will result in corrective action which may in severe cases lead to termination of employment or suspension of work arrangements.

Castellana Properties may, from time to time, amend this Code of Ethics. These changes will be communicated to all employees and other stakeholders.

5. **APPLYING OUR VALUES AND GUIDING PRINCIPLES**

5.1 **REGULATORY COMPLIANCE**

Castellana Properties' business and professional activities will be carried out in full compliance with current regulations.

Likewise, all contractual obligations and commitments assumed by Castellana Properties towards third parties shall be fully respected.

We will not knowingly engage in unlawful activity or in acts that are or could be damaging to Castellana Properties' reputation, and we will respect and contribute to the legitimate and ethical objectives of the company.

5.2 **LIVING WITH INTEGRITY**

Living with integrity entails always being honest, trustworthy, consistent, fair and truthful in everything we do.

(a) **Being honest**

Being honest means that we should:

- (i) not make any false, misleading or malicious statements;
- (ii) report accurately on performance, achievements and challenges;
- (iii) keep our word; and
- (iv) interact truthfully with competitors and stakeholders.

(b) **Reporting and preventing unethical and criminal behaviour**

In order to ensure prevention and reporting of unethical and criminal behavior, we should:

- (i) report any criminal and unethical conduct detected to Castellana Properties' Compliance Committee;
- (ii) not become involved in any criminal activity in our work or private life; and
- (iii) use all available legal resources to ensure that Castellana Properties fights crime from internal and external sources.

(c) **Acting responsibly when giving and receiving gifts and hospitality**

To give and receive gifts responsibly, we should, in our personal capacity:

- (i) not solicit or accept any item of value that would influence us not to objectively perform our duties;
- (ii) act transparently;
- (iii) not accept loans and/or cash gifts from clients or suppliers;
- (iv) not give or receive gifts for the purpose of improperly influencing others; and
- (v) declare and disclose all gifts in line with Castellana's Gift Policy (see Annex A).

(d) **Avoiding conflicts of interest (including perceived conflicts)**

To avoid conflicts of interest, we should:

- (i) avoid any situation that may involve a conflict of interest, be it actual or perceived, between personal interests and the interests of Castellana;
- (ii) not attempt to influence individuals in public office to obtain improper gain or advantage;
- (iii) disclose and obtain prior approval (if applicable) for any personal or family interests that could influence business dealings within Castellana Properties in line with Castellana Properties' Conflict of Interest Policy (see Annex B).
- (iv) Directors shall fully comply with their fiduciary duties.

(e) **Acting transparently and objectively for the purpose of any selection of suppliers and contractors.**

- (i) The selection of suppliers and contractors must avoid situations that could put into question the impartiality or objectivity of the procedure;
- (ii) Such selection must be based on objective criteria to avoid any actual or perceived favoritism;
- (iii) Needless to say, you may not offer, give, promise or receive money or any item of value to/from a third party if it could be understood as an attempt to influence a business relationship with Castellana Properties;
- (iv) This Code shall apply, as far as possible, to suppliers or any other individual or entity doing business with Castellana Properties; the Company shall not engage in business with entities whose code of ethics or conduct is not, at least, respectful of Castellana Properties' general ethical principles, or which fail to comply with our Code of Ethics.

(f) **Maintaining an attitude of respect and collaboration with the public authorities and avoid corruption**

- (i) An attitude of respect shall be maintained with supervisory, regulatory or any other authority;
- (ii) The delivery, promise or offer of favors, payments, commissions, gifts or retribution, either directly or through partners, collaborators and intermediaries (whether a natural or legal person) to any authorities, public officials -domestic or foreign- or employees or managers of any public authority of Spain or any other country, shall not be tolerated.

(g) **Acting responsibly in respect of outside work and/or political and non-profit activities**

We are committed to Castellana Properties as devoted employees and we should:

- (i) not engage in any other remunerated activity without appropriate consent;
- (ii) not accept commission or remuneration for work that is not explicitly and contractually defined in Castellana Properties' work agreements without appropriate consent;
- (iii) be responsible when engaging in non-profit and political activities, making sure that we do not bring Castellana Properties into disrepute; and
- (iv) not make use of Castellana Properties' resources to conduct private or political activities.

5.3 **TRANSPARENCY, ANTI-CORRUPTION AND CRIMINAL COMPLIANCE**

Castellana Properties has implemented effective anti-corruption policies and procedures and operates in accordance with the highest standards of ethics and integrity, while ensuring the application of best good governance and supervision practices. Castellana Properties has an accessible and secure Whistleblower Channel and a Criminal Compliance Model that defines our principles of action and the implementation of a culture of effective compliance.

5.4 **ACTING AS CUSTODIANS OF STAKEHOLDER VALUE**

We take full responsibility for all our actions and failures to act, and further act as custodians of stakeholder value. We deliver on our commitments to one another, our clients and other stakeholders.

(a) **Protecting Castellana Properties' reputation and good name**

To guard and protect Castellana Properties' reputation and good name, we should.

- (i) uphold Castellana Properties' values and principles;
- (ii) not engage in private activities that could bring Castellana Properties into disrepute;
- (iii) protect Castellana Properties' brand image; and
- (iv) be seen to be loyal and committed to Castellana Properties.

(b) **Using company resources effectively and responsibly**

To use Castellana Properties' resources effectively and responsibly, we should:

- (i) safeguard Castellana Properties' resources, such as buildings, vehicles, computers and furniture, and ensure that we apply these resources wisely;
- (ii) ensure the efficient use of "company time"; and
- (iii) not use Castellana Properties' resources for unlawful private purposes and personal enrichment.

(c) **Protecting confidentiality**

To protect our customers, shareholders and other stakeholders, we should:

- (i) ensure that the information of our stakeholders and business partners is secured;
- (ii) protect our intellectual property and that of our business partners;
- (iii) not use confidential information improperly;
- (iv) comply with the data protection principles and obligations described in our Data Protection Policy;
- (v) adhere to Castellana Properties' policy on dealing in securities (Internal Code of Conduct); and
- (vi) manage IT systems in compliance with data protection regulations.

(d) **Continuity plan**

We must support the specific plans that have been set up to ensure business continuity. To that effect, the current plan allows:

- (i) to cater for and respond to a variety of potential business disruptions;
- (ii) to become aware of emergency response procedures;
- (iii) to report security breaches and personal protection incidents, misappropriations, etc. to the Compliance Committee.

(e) **Occupational health and safety: prevention of occupational hazards**

At Castellana Properties we provide our employees with a safe and stable environment, and are committed to keep our occupational risk prevention measures continuously updated while abiding by applicable regulations. We are all responsible for strictly complying with health and safety standards, and to that end we must:

- (i) make responsible use of the equipment assigned to us when carrying out risky activities;
- (ii) disseminate knowledge of this material among our colleagues;
- (iii) promote compliance with risk protection practices.

5.5 RESPECTING OTHERS

We acknowledge that all people have inherent worth and, as such, should be respected.

(a) **Treasuring Diversity**

To treasure diversity, we must:

- (i) promote an inclusive workplace;
- (ii) promote a culture that respects and makes the best possible use of the diversity of our employees;
- (iii) acknowledge and respect the traditions and cultures of every employee; and
- (iv) be sensitive to the traditions and cultures of our stakeholders and business partners.

(b) **Practicing fairness**

To practice fairness, we should:

- (i) not discriminate against any individual in terms of gender, race, age, religion, marital status, economic status, sexual orientation and disability;
- (ii) promote and maintain fair labor practices through the provision of a healthy and safe environment;
- (iii) be consistent in our judgments and aim to apply similar actions to similar situations; and
- (iv) respect the dignity and basic human rights of our fellow employees, colleagues and other stakeholders.

(c) **Protecting dignity**

To protect the dignity of others, we should:

- (i) create a work environment that is free of sexual harassment or any other form of harassment;
- (ii) not become involved in any form of discrimination and intimidation;
- (iii) not use offensive language or insensitive communications; and
- (iv) avoid creating, sending and forwarding e-mails and/or other messages that contain statements or material that anyone could reasonably perceive to be discriminatory, offensive, pornographic, defamatory, illegal or harassing in nature.

(d) **Protecting our communities and the environment**

To protect the interests of our communities and the environment, we should:

- (i) be responsive to the legitimate and viable needs of the communities in which we operate; and
- (ii) responsibly manage and limit the environmental impact of our business.

6. **CONSULTING AND REPORTING**

6.1 **CONSULTING CONFIDENTIALLY**

You may feel the need to consult someone about a decision or action you are required to take or carry out and are unsure about its consistency with the letter and spirit of this Code of Ethics.

If you have any query or concern, or if you need guidance or advice, you should pursue the following course of action until the matter has been resolved, i.e.:

- (a) Consult confidentially with your line manager.
- (b) Consult confidentially with Castellana's Compliance Committee.

6.2 **REPORTING**

Reporting theft, fraud or corruption, or any other form of criminal wrongdoing.

Castellana Ethics Hotline

canaldedenuncias@castellanaproperties.es,

7. **MAKING ETHICAL DECISIONS**

Whenever you make a decision, ask yourself the following four questions based on the recognized PLUS filter. If you cannot answer yes to all four questions, there may be an ethical issue related to your course of action. In that case, you should seek guidance.

Question 1: Do the conduct provisions in the Code of Ethics and other Castellana Properties policies or procedures applicable to the situation permit the behavior that I am considering?

Question 2: Do laws and regulations permit the behavior that I am considering?

Question 3: Is the proposed action/decision consistent with Castellana Properties' values and principles?

Question 4: Do my personal values -my own sense of ethics- allow me to do so?

8. BREACH OF THE CODE OF ETHICS

Castellana Properties will implement the necessary measures for the effective application of the Code of Ethics -see section on "Application and Compliance"-.

No one, regardless of their level or position, is authorized to request that a Castellana Properties professional commit an illegal act or any act that contravenes the provisions of the Code of Ethics. In turn, no Castellana Properties professional may justify improper or illegal conduct or conduct that contravenes the provisions of the Code of Ethics on the grounds of an order from a hierarchical superior.

If the company finds that any member of Castellana Properties' staff has carried out activities that infringes on any statute, regulation or the Code of Ethics, the company will apply disciplinary measures in accordance with the sanctioning regime provided for in applicable labor regulations, the applicable collective bargaining agreement and other civil and commercial obligations binding on the offender.

Information provided through the Whistleblower Channel will be processed in accordance with the applicable data protection regulations governing the management of communication received through such channel, as well as to carry out any investigation on such infringement.

Castellana Properties will treat at all times all personal data received through the Whistleblower Channel as confidential information and will adopt all necessary technical and organizational measures to guarantee the security of the data and avoid its alteration, loss, unauthorized processing or access, taking into account the state of the technology, the nature of the data stored and the risks to which they are exposed, all in compliance with the provisions of regulations governing the protection of personal data.

As a general rule, the reported individual shall be informed of the existence of the complaint at the time the investigation is initiated. However, in cases where there is a significant risk that such notification would jeopardize the ability to effectively investigate the allegation or gather the necessary evidence, notification to the reported individual may be delayed for as long as such risk exists. In any case, such period shall never exceed the period established in the data protection regulations applicable from time to time.

Employees who file a report through the Whistleblower Channel must ensure that all personal information provided is true, accurate, complete and up-to-date. In any event, data processed in the context of investigations will be deleted as soon as such investigations are completed, unless the measures taken result in administrative or judicial proceedings. Castellana Properties will also keep such information duly blocked during such periods of time in which employee complaints or actions carried out by the company could result in liabilities.

Users of the Whistleblower Channel may at any time exercise their rights of access, rectification, cancellation and opposition with respect to their personal data by written notice to the registered office of the Company, including a photocopy of their national identity card and indicating the specific right they wish to exercise.

9. **BODY RESPONSIBLE FOR COMPLIANCE WITH THE CODE OF ETHICS**

Within the framework of this Code, and as a body responsible for the control and supervision of the consultations or complaints about Castellana Properties, a body in charge of ensuring compliance with the Code of Ethics and the Criminal Compliance Model, the so-called "Compliance Committee", has been created.

The Compliance Committee shall have the following functions and duties:

- (a) To promote the dissemination, awareness and compliance with the ethical principles contained in the Code.
- (b) To construe the rules and principles of the Code, guiding the actions of the individuals subject to it.
- (c) To process and manage requests, queries and complaints filed through the ethics mailbox or Whistleblower Channel, and to investigate possible alleged breaches and facilitate conflict resolution.
- (d) To periodically review and update the Code in order to adjust its content to the needs of the Company, through the preparation of recommendations and proposals thereby taking into consideration possible suggestions and proposals for improvement made by Castellana Properties' personnel.
- (e) To evaluate and prepare an annual follow-up report on the degree of compliance with the Code, which will be communicated to Castellana Properties' Management Body and which will include an evaluation and analysis of the actions carried out to crystallize the principles of the Code within the organization, any deficiencies detected and potential areas for improvement.

The functions of the Compliance Committee regarding Criminal Compliance matters are set out in the Criminal Compliance Policy, a copy of which shall be given to personnel joining the organization as part of their welcome pack, together with this Code of Ethics and other general documents and policies.

Additionally, it is the obligation of all personnel to collaborate and assist in the fulfillment and application of this Code of Ethics, as well as to collaborate with the Compliance Committee to achieve any targets defined as such in Castellana Properties' ethical-business regulations.

10. **APPLICATION AND COMPLIANCE**

10.1 **Communication, Distribution and Evaluation**

The Code of Ethics shall be communicated and distributed to all Code Subjects. The Compliance Committee shall be responsible for such distribution.

To that effect:

- (a) A copy of the Code of Ethics will be provided to all personnel and new hires. Thus, by adhering to the Code of Ethics, employees undertake to comply with it diligently and in accordance with the principles of good faith, integrity and loyalty.
- (b) The Code will be distributed through internal IT platforms.
- (c) The Code shall further be disseminated under any specific communication plan.

- (d) Suppliers or external personnel with whom Castellana Properties maintains contractual relations shall adhere to Castellana Properties' Code of Ethics prior to the commencement of the provision of services or at the time of supplier evaluation. Alternatively, Castellana Properties will review the commitments made by these third parties or external personnel in order to assess whether their ethical standards are as high as those of Castellana Properties. If so, such third parties need not adhere to the Code of Ethics. However, as stated in the Principles section, Castellana Properties will not engage in business or commercial relations with entities whose code of ethics or code of conduct is not, at the very least, respectful of Castellana Properties' general ethical principles or does not comply with this Code of Ethics.

The Compliance Committee will evaluate and report annually on the degree of compliance with this Code. Such report shall be provided to the Board of Directors.

10.2 **Acceptance**

Castellana Properties' personnel expressly accept the vision, values and principles established in the Code of Ethics. To that effect, they will sign an acknowledgment that they have read this Code and agree to comply with all provisions herein.

Individuals who join or become part of Castellana Properties in the future will expressly accept the vision, values and principles established in the Code of Ethics.

The Code of Ethics will be included in the Welcome Pack for new hires.

10.3 **Disciplinary regime**

Failure to comply with Castellana Properties' rules and principles, this Code of Ethics and its Criminal Compliance Model will result in a sanction, in accordance with the labor regulations in force, the Spanish Workers' Statute and the relevant collective bargaining agreement, without prejudice to other administrative, civil or criminal liabilities that, in the specific case, may be applicable. Infringement of the Code of Ethics or the Criminal Compliance Model will result in a misconduct leading to the application of disciplinary measures (to be determined based on such misconduct).

In any case, any subsequent sanctioning procedure will be governed by strict respect for the fundamental rights and guarantees inherent to any sanctioning procedure.

10.4 **Updating the Code**

This Code shall be reviewed and updated from time to time in accordance with the annual reports prepared by the Compliance Committee, as well as on the basis of any proposals and suggestions made by those subject to the Code or possible regulatory changes.

10.5 **Approval and entry into force**

This Code of Ethics will come into force following approval by the Board of Directors of Castellana Properties SOCIMI, S.A.

This Code of Ethics was approved at the meeting of the Board of Directors of Castellana Properties SOCIMI, S.A. held on 14 march 2022.

ANNEX A - GIFTS POLICY

Definition

Gifts include goods, services, experiences or favors received in the line of work. These may include, without limitation, stationery, marketing materials/branded products, alcohol, third party donations, meals, vouchers, indulgences, hunting trips, weekend breaks, holidays, tickets to sporting or other events or productions, overseas trips and airline tickets.

Acceptance considerations

Before deciding whether to accept or reject a gift, the relevant individual should consider whether accepting the gift is in Castellana Properties' best interest and whether there is any risk that acceptance may influence his/her actions and future decisions. The following issues should be considered before accepting the gift:

- (a) Intentions of the person offering the gift (appreciation, relationship building, etc.)
- (b) Timing of the gift (tender award period, etc.)
- (c) Value of the gift

Rules for acceptance of gifts

Nature of gift	Action Required
Gifts in cash or EFT transfer	<ul style="list-style-type: none"> • Strictly prohibited
Gifts of a value of less than € 200	<ul style="list-style-type: none"> • May be accepted without prior approval
Gifts valued at more than € 200	<ul style="list-style-type: none"> • Require prior approval of the Compliance Committee.

Rules for giving of gifts

Nature of gift	Action Required
Gifts in cash or EFT transfer	<ul style="list-style-type: none"> • Strictly prohibited
Gifts valued at less than € 200	<ul style="list-style-type: none"> • Requires line manager or any executive director's preapproval.
Gifts valued at more than € 200	<ul style="list-style-type: none"> • Requires prior approval of the Compliance Committee.

ANNEX B - CONFLICTS OF INTEREST POLICY

What constitutes a conflict of interest?

It is the obligation of Castellana Properties personnel to avoid conflicts of interest and to ensure that their outside activities or personal or family interests do not undermine their ability to make ethical and objective decisions in their field of responsibility. Additionally, it is the obligation of the directors of CPS to comply with their fiduciary duties under the Spanish Companies Act.

The Spanish Companies Act provides for a duty of loyalty on the part of directors, as a general clause, whereby they must act in good faith and in the best interest of the organization. In addition, *inter alia*, the Act establishes the obligation to refrain from participating in the deliberation and voting on resolutions or decisions in which the board member (or a related person) has a conflict of interest.

Also, and as a general rule, personnel should avoid involvement in activities such as:

- (a) The exploitation for one's own benefit of any business opportunity of which one has become aware through information obtained within the company and in which the company has an interest, including a reasonable prospect of a business opportunity.
- (b) Personal or family interests of a magnitude that is relevant to the employee and/or the other party involved, in any company or other entity with which Castellana Properties has or may come to have a business relationship.
- (c) Second employment (including the management of any company or entity) or performance of any other outside activity that could conflict with Castellana Properties' interests or interfere in any way with the performance of their responsibilities in the company.
- (d) Accepting any gift -regardless of value- that is or could be seen as a reward for favorable treatment in connection with any company business. See Annex I - Gifts Policy

The key to dealing with any conflict is to disclose it openly. Therefore, Staff should always disclose to their line manager if there is a potential conflict of interest that may influence or appear to influence their opinions and actions. This will make it possible to assess whether or not it is detrimental to the company and, if necessary, to implement measures to ensure objective decision-making.

In addition, Castellana Properties' Internal Code of Conduct must be complied with when trading securities negotiable on BME Growth, in the form and manner described therein.

All conflicts of interest must be disclosed through the Castellana Properties' Conflict of Interest Register. For further information or inquiries regarding conflicts of interest, please contact Castellana Properties' Compliance Committee.

ANNEX C - WHISTLEBLOWER PROCEDURE

Employees should report any suspected violation of the Code of Ethics in line with the prescribed procedure set out in section 6.2 of the Code of Ethics. A potential violation of the Code of Ethics is a very serious matter. All employees are responsible for protecting our culture of integrity, in line with our risk culture: "You see it - You own it". If you see it, you have to manage it as your own.