

CODE OF ETHICS OF CEMIDE S.L. AND COMPANIES OF THE CUÑADO GROUP

I.- DECLARATION OF ETHICAL PRINCIPLES

The Ethical Code of Conduct (hereinafter, the “Ethical Code”) gathers the catalog of Ethical Principles and Rules of Conduct that must govern the actions of all the employees of **CEMIDE S.L.** (hereinafter, the Company) as well as its subsidiaries, associated and/or participated companies that belong to **GRUPO CUÑADO**; constituting an express declaration of its principles, values and guidelines of conduct that must inspire the behaviour of the employees of all the companies of the Group, in the development of their work and professional activity.

Its ultimate purpose is to promote a corporate culture that shows our values both internally and externally to our customers and suppliers beyond the legal requirements.

The Company declares as a Fundamental Ethical Principle that it rejects any form of corruption and that it will unequivocally ensure that within the companies of its Group and in its relations with third parties, honest and honest behavior is observed, without any discrimination and complying at all times with the established legal precepts in such a way that there is no doubt about its commitment, paying special attention to those rules and recommendations that are specific to its activity, committing to update and review all its internal processes permanently in order to adapt them to the circumstances of each moment.

All employees must always avoid any conduct that could damage or endanger the Company or its reputation, acting legally and honestly.

II.- PERSONS SUBJECT

The Code of Ethics applies in its entirety to the members of the management bodies and to all employees, including interns, trainees, temporary employment agencies, etc., and also extends to all those individuals and/or legal entities linked to the Company in a business or professional capacity (suppliers, external advisors or professionals, etc.) in those matters applicable to them.

III.- OBLIGATION TO KNOW AND COMPLY WITH THE CODE OF ETHICS

All persons subject to the code according to the previous stipulation have the obligation to know and comply with it, as well as to collaborate to facilitate its implementation in the Company.

They must accept their personal responsibility for the fulfillment of the company's policy based on its ethical principles, taking special care with the following obligations:

- To perform their professional duties with honesty, care, diligence, professionalism and integrity.
- To assume and fulfill the commitment to act always doing the right thing.
- Not to make commitments or promises of any kind that may be detrimental to the interests of the Company.
- Understand that non-compliance with the rules is not an option, but may result in serious liabilities.
- Bring to the Company's attention through the Whistleblower Channel any breach of this code or possible offense of which they are aware.

IV.- CONTROL OF THE APPLICATION OF THE CODE OF ETHICS

The Human Resources Department and the Company's Compliance Body will ensure the correct communication of the Code of Ethics to all those subject to it and to persons who, for any reason, must be subject to its rules.

V.- GENERAL ETHICAL PRINCIPLES OF THE COMPANY

Good corporate governance and professional ethics are the ethical principles of the Company, so that all employees and members of the management body must act with the utmost respect for the law in force.

a) Equal opportunities and non-discrimination

The Company will provide equal opportunities in access to employment and professional promotion, ensuring at all times the absence of discrimination on grounds of sex or sexual orientation, disability, race, religion, origin, marital status or social status.

Harassment, abuse, intimidation, discrimination or any other type of physical or verbal aggression will not be permitted or tolerated in the workplace.

b) Co-responsibility measures

Managers shall promote a work environment that is compatible with personal development, ensuring that it is possible to exercise the co-responsibility measures established in the legislation in force at all times.

CEMIDE and its group companies shall fully comply with the applicable legislation in this area, applying the necessary measures and verifying that they are up to date.

c) Occupational risk prevention

Employees shall at all times respect the preventive measures implemented by the company in matters of health and safety, assuming the Occupational Risk Prevention procedures established by the organization and complying with the preventive functions associated with their position, as indicated in the Prevention Plan of CEMIDE and the companies of the group.

d) Environmental protection and social responsibility policies.

Employees must commit themselves actively and responsibly to the conservation of the environment, using the means recommended by the Company in this regard and following those that are standard practice in the labor and professional policies of the sector, as well as the measures outlined in the quality policies of the entity.

We promote efficiency in the consumption of resources and the prevention of environmental pollution.

Following the principles of the European directive on corporate due diligence in sustainability, the Company will contribute to promote sustainable and responsible business behavior.

To this end, it will implement the following policies:

- integrate due diligence into its strategies
- identify actual or potential negative impacts on human rights and the environment arising from its activities
- prevent or mitigate potential negative impacts
- establish and maintain a grievance procedure
- monitor the effectiveness of the due diligence strategy and measures.
- All employees shall perform their duties in safe and healthy working conditions.

e) Violence and harassment

GRUPO CUÑADO rejects violence, exploitation and harassment in all its forms. We do not tolerate attitudes that affect the dignity of our workers.

f) Forced labor

We defend the abolition of any form of forced, coerced or compulsory labor, so that all workers can have access to decent work. Corporal punishment, coercion, exploitation and oral or physical abuse are prohibited in our company.

g) Child labor

GRUPO CUÑADO is a company that supports the elimination of child labor and ensures compliance with the minimum age for admission to employment.

VI.- GENERAL RULES AND GUIDELINES OF CONDUCT

a) Compliance with the regulations

All employees must ensure the integrity of the relationships with customers and suppliers, guaranteeing that during the term of the contractual relationships the following are observed the requirements set forth therein are met in an unequivocal and transparent manner; the information published or disseminated by personnel to customers and suppliers shall be truthful and clear.

b) Conflicts of interest

A conflict of interest occurs when the personal interests of an employee or those of a third party compete with the interests of the Company, for which reason they shall always act in the Company's best interest, making appropriate use of the means at their disposal and avoiding actions that could be detrimental to the Company.

They shall refrain from using for their own benefit business opportunities that are of interest to the Company, as well as from participating in any way in commercial activities carried out by the Company in which they have an interest of their own or of a related person.

Likewise, they shall avoid any kind of interference that may affect their impartiality or objectivity in any of the Company's business processes.

This guideline of conduct shall be applied both in relations with the Company itself, as well as in relations with customers, suppliers or any other third party.

The contracting of external supplies and services must be carried out in accordance with established internal procedures.

In the event of a Conflict of Interest, the employee must immediately inform his or her superior, the HR manager or the Compliance manager.

c) Application of the Code of Ethics to suppliers

All suppliers working or wishing to work with the Company must comply with the Code of Ethics and current legislation, as well as undertake to respect human rights.

The Supplier shall inform the Company of any non-compliance or suspected non-compliance with the Code of Ethics using the Whistleblower Channel.

Failure to comply with this obligation shall entitle the Company to terminate the contract with such supplier.

The selection of suppliers and the determination of purchasing conditions shall be based on the objective evaluation of quality, price and the ability to provide and guarantee services of an appropriate level.

d) Customer relations

The main objective of the Company is represented by the full satisfaction of the expectations and needs of its customers, in order to consolidate a relationship inspired by the values of correctness, honesty, efficiency and professionalism.

All services will be provided with the utmost professionalism and diligence and always in accordance with the legal regulations in force, informing the client at all times of the circumstances and consequences of each specific case, so that he/she has all the information in cases where he/she must make serious decisions derived from the state of health of the animals treated in the Company's centers.

e) Relations with suppliers and/or public officials

All employees and members of the management bodies shall relate to suppliers in a lawful and ethical manner, and their selection shall be governed by criteria of objectivity and transparency that must be accredited.

The delivery, promise or offer of any kind of payment, commission, gift or retribution to any client, authority, official or public body is prohibited, whether it is made directly to them or indirectly through persons or companies related to them or interposed, whether it is addressed to the executive or employee of the client or supplier, official or public employee or to another person indicated by him/her; whether carried out

directly by a Group company or indirectly through partners, collaborators, agents, intermediaries, brokers, advisors or any other interposed persons.

Any invitation or attention that, due to its frequency, characteristics or circumstances, could be interpreted as an intention to affect the impartial judgment of the recipient, shall be rejected and brought to the attention of the compliance body.

Gifts or donations that employees may receive from customers or suppliers, which are outside normal business practices, are illegitimate and must be brought to the attention of the HR manager. Normal business practice is understood to be gifts or business courtesies that are within the bounds of business courtesies in the marketplace and of modest value.

By way of example, the following are included in this definition:

- Promotional items of modest value
- The normal invitations that do not exceed the limits considered reasonable in the customary uses of courtesy in the businesses in each commercial plaza.
- Occasional attentions for specific and exceptional causes (such as Christmas or wedding gifts), provided that they are not in cash and are within reasonable and modest limits.

Employees must refuse and inform the Compliance Committee of any request by a third party for payments, commissions, gifts or remuneration other than those mentioned in the previous point.

f) Relationships between employees

The most valued asset for the company is the personal and professional relations between all employees, so that there is always an atmosphere of respect and personal appreciation, which results in good organization, good emotional health and appropriate standards of courtesy and respect both internally and externally.

The basic duties in this regard are the collaboration between employees to contribute to the success of their tasks, mutual loyalty, alignment with the values of the Company, attention to all communications issued, as well as a proactive attitude in their professional work.

VII.- CONFIDENTIALITY AND EXTERNAL RELATIONS

a) General duty of secrecy

The way of using the information existing in the Company's systems may generate undesirable and harmful results insofar as they may have repercussions on the Company or its customers, and therefore, in general, employees must maintain professional secrecy with respect to any non-public data or information they may learn as a result of the exercise of their professional activity, whether they come from or refer to customers, suppliers, the Company, other employees, managers or any other third party.

They shall refrain from using the information they learn in the course of their work for any purpose other than that for which it is intended, and may not in any case retain or duplicate it.

This obligation of secrecy persists even after the termination of the relationship with the Company.

Employees shall strictly comply with the rules established in the policy on the Use of Information and Communication Technologies.

g) External Relations

Employees shall refrain from transmitting, on their own initiative or at the request of third parties, any information or news about the Company or third parties to the media.

The link, membership or collaboration with political parties, NGOs or other types of entities, institutions or associations, as well as contributions or services to them, must be made in such a way that their personal nature is made clear.

h) Rights of third parties

Employees and members of the administrative bodies shall also respect the intellectual and industrial property rights held by third parties outside the Company; in particular, they shall not incorporate, use or employ in their work any type of information or documentation belonging to another Company that has been obtained as a result of the performance of a previous position without due consent and that refers to commercial, strategic and/or financial information of competitors.

VIII.- ASSET PROTECTION AND ACCOUNTING PRACTICES

a) Protection of assets

Employees shall ensure that the Company's assets do not suffer any damage, including among these, in addition to tangible assets, financial records, accounting and confidential information of the Company, ensuring in all cases that they are used in a manner appropriate to the purpose of the professional functions for which they have been delivered; complying with all internal control procedures established by the Company to protect the assets.

b) Financial and accounting information

The Company's financial information shall be prepared reliably and rigorously.

All internal control procedures established by the Company shall be complied with in order to guarantee the correct accounting of transactions and their adequate reflection in the financial information published by the Company.

All practices that involve the illegal avoidance of the payment of taxes to the detriment of the Public Treasury shall be avoided.

The Board of Directors shall be informed of the tax policies applied by CEMIDE and Group companies, as well as the tax consequences thereof when they constitute a relevant factor.

IX.- COMPLIANCE BODY

The Company has a Compliance body for the control and development of the compliance policy, which shall be responsible for the interpretation of the rules of this Code of Ethics and shall adopt the general decisions for the application thereof.

X.- WHISTLE-BLOWER CHANNEL

In accordance with current legislation, the Company has a whistle-blower channel available to employees, customers and suppliers so that they can report any breach of the Code of Ethics or suspicions of unlawful conduct.

This channel is not a customer service, suggestion box or similar.

Users of this channel must respect the established rules of operation and the Company will guarantee at all times, the correct treatment of personal data that have been provided, as well as the exercise of the rights established in the Data Protection legislation.