



# ROMAR GLOBAL CARE group

## CODE OF CONDUCT



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# 1 General Provisions



# 1. General Provisions

## 1.1. PURPOSE

The Code of Conduct (hereinafter, the “Code”) of Grupo Romar Global Care (hereinafter, “RGC or Group”) aims to establish the criteria for action that must be observed by RGC in the performance of its professional responsibilities.

The objective is to ensure professional, ethical and responsible behaviour on the part of RGC and all its employees in the performance of their activities as a fundamental element of its corporate culture, which is based on the training and personal and professional development of its employees.

To this end, the principles and values that should govern Romar’s relationships with its employees, customers, suppliers, business partners and other companies in which it develops its business model are defined.

## 1.2. SCOPE OF APPLICATION

Unless otherwise indicated, this Code of Conduct shall expressly apply to all companies in the Group and, specifically, to:

- RGC executives
- RGC employees
- Suppliers of good or services
- External consultants
- Any other person or entity included in the scope of application of the Code by internal decision of Romar and in view of the circumstances of each case

and when appropriate for the fulfilment of its purpose.

Depending on the type of activity performed by the employee, they will be subject to both general rules of conduct and specific rules applicable to their activity.

The Code will be communicated personally and compliance with it must be accepted in writing.

Likewise, the obligation to comply with it will be expressly included in employment contracts, and employees will be given a copy when they join the Company. Keeping it handy and consulting it frequently will help us all to act with honesty, integrity, responsibility and respect in order to achieve the Company’s objectives. It provides clear and easy-to-understand principles to guide our conduct and maintain RGC’s good reputation.

To this end:

- It establishes the principle for the prevention, detection and eradication of irregular conduct, whatever its nature, including, among others, risk analysis, the definition of responsibilities, employee training and the formalisation of procedures for the notification and immediate elimination of irregular conduct.

# 1. General Provisions

- It facilitates the understanding and application of RGC's corporate culture based on compliance with human and social rights and the effective integration of all employees into the Company, with respect for their diversity.

## 1.3. COMPLIANCE COMMITTEE

Romar has a Compliance Committee that is responsible for ensuring compliance with this document, as well as implementing it, disseminating it and managing its updating, when appropriate.

## 1.4. BREACHES OF THE CODE. REPORTING CHANNEL

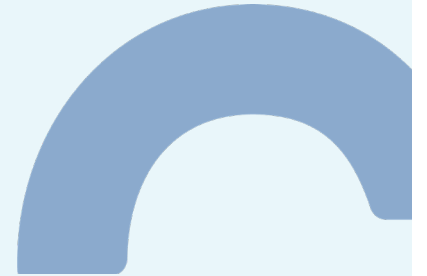
All employees have a duty to report any violation of the Code of which they are aware through the Reporting Channel. To make such a report, they must comply with the provisions of the Group's Reporting Channel Use Procedure.

## 1.5. UPDATE

This Code is dynamic in nature and will be reviewed and updated every two years or sooner, if necessary.



## 2 RGC's internal principles



## 2. RGC's internal principles

Romar's culture of "zero tolerance" towards ethically reprehensible conduct, as well as possible breaches of current criminal law, is the reason why basic principles and corporate rules have been established within the Group, which must be complied with by all Romar members and employees.

These principles are based on the absolute rejection of any criminal behaviour, conduct or activity, both within Romar's internal activities and in the course of Romar's business activities.

### 2.1. PRINCIPLE OF EQUALITY, NON-DISCRIMINATION AND PROFESSIONAL DEVELOPMENT

RGC's activity is governed by the principle of equality and non-discrimination. The Group provides equal opportunities in access to work and professional promotion, ensuring at all times the absence of discrimination on the basis of sex or sexual orientation, race, religion, origin, marital status or social condition.

Employees involved in recruitment, selection and/or professional promotion processes will be guided by this principle, with the aim of identifying those individuals who best match the profile and requirements of the position to be filled, promoting equal opportunities and objectivity in decision-making at all times. Employee evaluations will be based on the employee's qualifications, fairness, competence, merit and transparency.

The Group is committed to providing the necessary resources to contribute to the learning, training and updating of the knowledge, skills and risks of its staff.

Anyone who feels that their working environment does not comply with the above principles may raise their concerns with the Human Resources department or use the Reporting Channel.

### 2.2. PRINCIPLE OF RESPECT FOR DIGNITY, HONOUR AND PRIVACY

All employees are required to act in their working relationships with other employees in accordance with criteria of respect, dignity and fairness, taking into account the different cultural sensitivities of each person and not allowing any form of violence, harassment or abuse at work, or discrimination on the basis of race, religion, colour, age, nationality, sex, disability or any other personal or social condition unrelated to their merit and ability. .

The consumption of psychotropic substances that could affect the proper fulfilment of professional obligations, such as alcohol or any type of drug, is prohibited.

## 2. RGC's internal principles

### 2.3. PRINCIPLE OF WORK-LIFE BALANCE. COLLECTIVE RIGHTS

In accordance with its corporate social responsibility guidelines, the Group is committed to ensuring, as far as possible, a work-life balance for its employees in order to promote their well-being.

RGC seeks to foster a communicative and deliberative work environment by promoting social dialogue between employees and Group representatives.

Internationally recognised rights of unionisation, association and collective bargaining must be respected by all employees. Romar will avoid any conduct that tends to impede or harm the rights of workers.

### 2.4. PRINCIPLE OF PREVENTION OF OCCUPATIONAL RISKS

RGC considers people to be a key business factor, defends and promotes compliance with human and labour rights, and is committed to applying regulations and good practices in terms of employment conditions, health and safety in the workplace.

The Group is committed to ensuring the health, safety and well-being of all employees. They play a fundamental role in ensuring the quality and safety of working conditions at all its facilities.

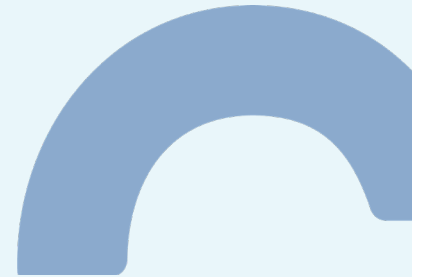
Consequently, all employees are expected to adopt a cooperative attitude on their own initiative with regard to the safety and hygiene of all RGC employees, customers and suppliers, as well as third parties working for the Company, and to comply with all safety programmes applicable to the Group.

### 2.5. ENVIRONMENTAL PROTECTION PRINCIPLE

Employees must be familiar with the Group's Environmental Policy and comply at all times with the legal requirements and internal procedures established by the Group at any given time to reduce or avoid, as far as possible, the environmental impact of its activities and meet the established objectives.

RGC is firmly committed to carrying out its activities under the premise of minimising negative environmental impacts and preventing pollution, specifically by protecting water sources, using them responsibly and reducing the consumption of natural resources. To this end, it has mandatory environmental management standards and systems in place.

# 3 General code of conduct guidelines



## 3. General code of conduct guidelines

### 3.1. COMPLIANCE WITH REGULATIONS. ETHICAL BEHAVIOUR

Employees must comply equally with the general national and international regulations that affect them and with the Group's internal procedures and documents that are applicable to their activity. Employees shall always refrain from participating in illegal activities. Under no circumstances shall it be justifiable to use the excuse of attracting business or generating profits of any kind for RGC. The following are expressly excluded:

- Activities related to gambling and gaming with persons who have any kind of professional or customer relationship with the Group.
- Acceptance of any type of income, commission or advantage, on a personal basis, that could be considered a gift and that originates from operations carried out on behalf of RGC. Employees may not use their work and position in the Group for their own benefit.
- Any employee who is investigated or accused in criminal proceedings that may affect their activity in the Group, and especially if it originates from the Group, must inform the Compliance Committee as soon as possible. The existence of administrative proceedings that significantly affect their work within the Company must be reported.

### 3.2. NON COMPETITION

RGC employees must avoid situations that could give rise to a conflict between their personal interests and those of the Company. They must also refrain from representing the Company and from intervening or influencing decisions in which they themselves or a third party linked to them have a personal interest.

No one may use their position in the Company to obtain personal or financial advantages or business opportunities for themselves; likewise, no one may act on behalf of RGC before a third party to obtain any type of service or consideration of a personal nature.

RGC shall not employ first or second degree relatives as a general rule, except in exceptional and objective circumstances, with the approval of the Company's Managing Director. An exception to these rules is the treatment of the children of company employees, who may be given priority for training jobs, during holidays, training periods or short-term scholarships, provided that they are as suitable as the other candidates.

Special care must be taken when responsible for selecting or negotiating with a supplier or external collaborator on behalf of the Company. Personal interests and relationships must not interfere or appear to interfere with the ability to make decisions in the best interests of RGC.

If doubts arise or a situation arises that may involve or give rise to a conflict of interest, you may consult with your immediate superior and/or the HR manager,

## 3. General code of conduct guidelines

as well as the Compliance Committee, in order to resolve the situation fairly and transparently.

You must be exclusively loyal to the RGC Group, always looking after its interests.

Some of the following examples show clear conflicts of interest that should be avoided:

- Participating in any activity that competes with the Group while working for it.
- Personally receiving any sum of cash or gifts of more than modest value. This section also includes asking for personal favours and loans from third parties (except banks) that have business relationships with RGC.
- Disclosing confidential information about the Group, as well as acquiring or maintaining an interest in any customer or supplier of the Company.
- Using the Group's name or invoking your status as an employee to carry out transactions on your own behalf or on behalf of related parties.
- Influencing the negotiation, contracting or payment of any RGC supplier.

Under no circumstances shall RGC be involved with political parties to which employees belong.

Likewise, Directors must inform the Compliance Committee in all cases of any other administrative body of which they are a member that could give rise to a conflict of interest with the Group.

The Group rejects misleading or disparaging advertising, as well as any other practice contrary to good faith, competition or third parties.

### 3.3. PROFESSIONALISM AND RESPONSIBILITY

RGC employees shall have a series of obligations and responsibilities in order to maintain their technical and professional capacity and exercise due prudence and care in the performance of their professional activities.

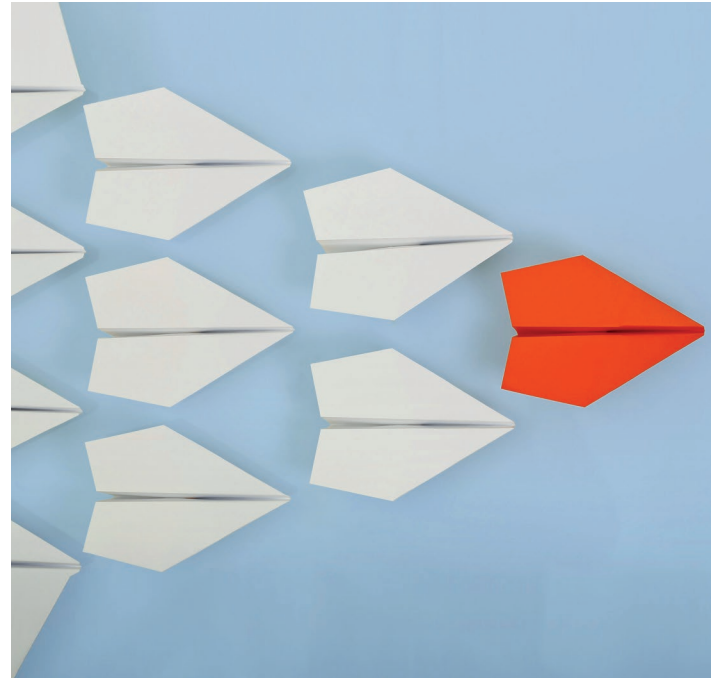
- They must be familiar with and comply with the procedures established internally by the Group.
- They shall comply at all times with applicable external and internal regulations.
- They shall make correct and appropriate use of the resources and assets to which they have access in the course of their professional activities.
- The use of computer equipment provided by the Group must always be carried out in accordance with the IT security measures implemented by RGC and the Group's intellectual property rights. In this regard, the Asset Use Procedure must be followed.

### 3. General code of conduct guidelines

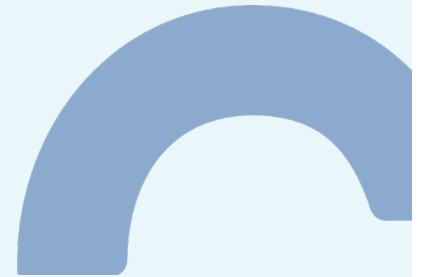
- They shall not use the image, name, brand or logo of RGC, or any other trade name used by the Group, outside the scope of their professional activity without due authorisation.
- They shall comply with the rules on health and safety at work, with the aim of preventing and minimising occupational risks.

#### **3.4. COMMITMENT TO ACT IN THE INTERESTS OF ROMAR AND ITS CUSTOMERS**

When carrying out their professional activities, employees shall put the interests of the Group or its customers ahead of their own interests, those of their family members or those of other persons related to them.



# 4 Specific guidelines of the code of conduct



## 4. Specific guidelines of the code of conduct

### 4.1. DEFENCE OF COMPETITION

The Group and its employees shall respect the principles and rules of fair competition and shall not violate competition laws. All agreements between competitors whose purpose is to coordinate their behaviour in the market are prohibited.

### 4.2. INVESTMENT IN BUSINESSES IN WHICH THE GROUP HAS AN INTEREST

If an employee wishes to participate in businesses in which the Group has an interest, or will participate directly, or even in those in which the Group has declined to participate, they must obtain prior authorisation from the Compliance Committee.

### 4.3. DUTY OF CONFIDENTIALITY

Much of the information that employees handle on a daily basis is confidential in nature: strategies, plans, recipes, production systems, designs, files, financial data, customer and supplier commercial data, or any other type of data.

Therefore, employees must maintain professional secrecy with regard to any data or information they become aware of as a result of their work, whether it originates from or refers to the Group, its customers and suppliers, other employees or any other third party. They must use such data or information exclusively for

the performance of their professional activity and may only disclose it to other professionals who need to know it for the same purpose and shall refrain from using it for their own benefit.

Even if they have the possibility of accessing certain information, such access shall only be justified when there is a professional interest as referred to above. Data and information relating to accounts, financial positions, financial statements and, in general, any client activity shall be treated with absolute confidentiality and in accordance with the limits imposed by the laws in force at any given time. This duty of confidentiality shall continue even after the employee's employment relationship with the Group has ended

### 4.4. RELATIONSHIPS WITH SUPPLIERS

The contracting of external supplies and services, as well as negotiations with external suppliers, must be carried out in accordance with internal purchasing and supplier evaluation procedures. Suppliers shall be contracted in a responsible manner, always taking into account the principles of transparency, objectivity and equal opportunities, and ensuring the application of objective and weighted criteria. Whenever there is an alternative, contracts shall not be awarded to companies where relatives of management personnel or personnel involved in the RGC Group's purchasing process work.

RGC expects its suppliers to share the principles of this Code and may therefore require suppliers to demonstrate their application of these principles or request, through a contractual clause, that they adhere to the provisions of this Code.

## 4. Specific guidelines of the code of conduct

The Group's employees and managers must never influence the will of third parties, directly or indirectly, through favours, in order to obtain benefits or advantages in their own interest or in that of the Group.

### 4.5. CUSTOMER RELATIONS

Relationships with customers must be guided by the utmost honesty, always offering the best possible service.

Exclusive relationships with customers that could lead to excessive personal ties or restrict their access to other employees should be avoided.

Group employees and managers must never influence the will of third parties, directly or indirectly, through favours, to obtain benefits or advantages in their own interest or in that of the Group.

### 4.6. PROTECTION OF PERSONAL DATA

The commitment to quality and efficiency with all persons related to RGC implies that employees are obliged to respect the right to data protection, the right to honour and personal privacy of all persons whose data they have access to by reason of the performance of their activity within RGC.

Such respect must cover any information concerning a person: identifying data, affiliation, family, economic, audiovisual or any other information that allows

their identification.

Personal data will be processed in accordance with the principles established in data protection regulations, so that:

- Only data that is necessary for the activity will be collected.
- The collection, computerised or paper-based processing and subsequent use of data shall be carried out in such a way as to guarantee its security, veracity and accuracy, the right to privacy of individuals and compliance with the obligations arising from the applicable regulations.
- Only the personal data necessary for the functions and profiles assigned to employees, as established by the Group, may be accessed.
- The duty of secrecy and confidentiality with regard to personal information shall be guaranteed at all times and shall not be disclosed to third parties other than the data subject. All employees must comply with the data protection functions and obligations set out in the internal regulations, without prejudice to the instructions received from the Security Manager.

### 4.7. ACCEPTANCE OF GIFTS, COMMISSIONS OR FINANCIAL FACILITIES

The acceptance of any type of privileges, incentives or personal gifts of any

## 4. Specific guidelines of the code of conduct

nature from a third party, particularly suppliers, is prohibited, unless they are appropriate to the circumstances and of minimal value (< €150). The Compliance Committee must be informed by the employee who has received them when the amount exceeds €150.

Personal gifts or incentives offered to managers or employees by customers or suppliers exceeding €150 may only be accepted on special occasions when the Compliance Committee determines that the gift is in accordance with the principles governing this Code. In any case, the provisions of the Integrity Policy must be observed.

Any invitation, gift or attention that, due to its nature, frequency, characteristics or circumstances, could be interpreted as intended to influence the objectivity of the recipient, shall be rejected and brought to the attention of the Compliance Committee.

### 4.8. USE OF GROUP ASSETS AND EXPENSE POLICY

Employees shall take care at all times of the Group's assets at their disposal or to which they have access. They shall use the assets at their disposal by reason of their professional duties in a manner appropriate to the purpose for which they have been provided and shall not dispose of or encumber them without the appropriate authorisation.

Likewise, expenditure must comply with the provisions of the Expenditure Policy and, in any case, strictly with the needs of their professional activity, ensuring a

high degree of efficiency in the use of available resources.

### 4.9. USE OF INFORMATION AND COMMUNICATION TECHNOLOGIES

Employees shall strictly comply with the rules established by the Group in the Asset Use Procedure.

### 4.10. INTELLECTUAL AND INDUSTRIAL PROPERTY RIGHTS OF THE GROUP

Employees shall respect the intellectual property and right of use corresponding to the Group in relation to recipes, preparations, computer programmes and systems; equipment, manuals and videos; knowledge, processes, technology, know-how and, in general, other works and projects developed or created within the Group. Therefore, their use shall be carried out in the exercise of professional activity within the Group and all supporting material shall be returned when required and when they cease to be employed.

They shall not use the image, name, trademarks or logo of the Group or its companies, except for the proper performance of their professional activity within the Group. It is Romar's intention to ensure compliance with intellectual and industrial property laws, and therefore employees must check before using information from the internet whether it is protected by intellectual or industrial property laws.

## 4. Specific guidelines of the code of conduct

### 4.11. CORPORATE IMAGE AND REPUTATION

RGC considers its corporate image and reputation to be a valuable asset for maintaining the trust of its Board of Directors, employees, customers, suppliers, authorities and society in general. Employees must take the utmost care to preserve the Group's image and reputation in all their professional activities.





# 5 Rules for preventing criminal behaviour



## 5. Rules for preventing criminal behaviour

### 5.1. GUIDELINES FOR PREVENTING FRAUDULENT ACTIVITIES

The Group and its staff are committed to ensuring the transparency of all information transmitted to external agents, other companies, its auditors and public institutions, paying particular attention to financial information.

The Group has a Criminal Risk Prevention Model to which it is firmly committed.

### 5.2. GUIDELINES FOR AVOIDING CORRUPT CONDUCT BY PUBLIC OFFICIALS

The delivery, promise or offer of any kind of payment, commission, gift or remuneration to any authorities, public officials or employees or managers of companies or public bodies, both in Spain and abroad, is not permitted.

Exceptionally, gifts may be given whose value does not exceed €150, in accordance with the practices and customs of the sector. On special occasions, the Compliance Committee may accept other types of gifts, provided that they are in accordance with the principles governing this Code. Therefore, all gifts, both received and given, that exceed this amount must be approved by the aforementioned Committee.

### 5.3. GUIDELINES FOR AVOIDING CORRUPT CONDUCT BY INDIVIDUALS

RGC managers and employees, either directly or through intermediaries, must never offer or promise an improper personal or financial favour or other type of favour in order to obtain or secure business or other advantage from a third party, whether public or private. No one should accept such an advantage in exchange for preferential treatment from a third party.

Likewise, one must refrain from engaging in any activity or conduct that could give rise to the appearance or suspicion of such an attempt. Company managers and employees should be aware that offering or giving improper benefits in order to influence the recipient's decision may not only result in disciplinary action but also lead to criminal charges.

Gifts, meals or other forms of hospitality, or any other favours from customers or suppliers, should not be accepted if doing so could compromise your ability to make objective decisions in the best interests of Quimi Romar.

Gifts:

- Gifts should not be accepted in exchange for performing a favourable action or making promises to a customer or supplier.
- Gifts should not be requested from a customer or supplier.

## 5. Rules for preventing criminal behaviour

- Gifts in cash or cash equivalents, such as gift cards, should not be accepted.
- Gifts worth more than €150 should not be accepted.
- Gifts of symbolic value may be accepted, as well as a small gift basket at the end of the year.
- Gifts or discounts offered to a large group of employees as part of an agreement between the Group and a customer or supplier may also be accepted, to be used as intended by the latter.

Meals and hospitality: Refusal of gifts, meals and hospitality:

- Meals or other types of hospitality and entertainment should not be accepted in exchange for doing something or making promises for a customer or supplier.
- Meals or other types of hospitality should not be requested from a customer or supplier.
- Meals and other occasional gifts from customers and suppliers may be accepted if the customer or supplier attends the event and the costs involved are in line with the stipulated limits.

If a gift, meal or other form of hospitality is offered that exceeds the stated limits, it should be politely declined with an explanation of the Company's policy. If

returning a gift would offend the giver or the circumstances in which it was given prevent its return, it may be accepted, but the Compliance Committee must be notified. Such gifts may be donated to charity or distributed or raffled off among a large group of employees.

Gifts, meals and other forms of hospitality for customers and suppliers must support the Group's legitimate business interests and must be reasonable and appropriate to the circumstances.

This category does not include work-related incentives given to these individuals, covered by the agreed contractual relationship and in accordance with the customs and practices of the sector. The Compliance Committee may approve exceptions to this case study provided that the actions are in accordance with the principles governing this Code.

### 5.4. GUIDELINES FOR AVOIDING CONDUCT RELATED TO MONEY LAUNDERING AND TERRORIST FINANCING

RGC prohibits any conduct directly or indirectly related to money laundering (the acquisition, use, conversion or transfer of property derived from certain criminal activities or participation in them, in order to conceal or disguise its origin or to help the person who has participated in the criminal activity to evade the legal consequences of their actions) and the financing of terrorism (collecting, acquiring, possessing, using, converting, transferring or carrying out any other activity with goods or securities of any kind with the intention that they be used, or in the knowledge that they will be used, in whole or in part to commit terrorist

## 5. Rules for preventing criminal behaviour

offences). All employees are required to report any suspicious conduct or conduct that may constitute money laundering or terrorist financing.

### 5.5. GUIDELINES FOR AVOIDING CONDUCT RELATED TO TAX CRIMES AND CRIMES AGAINST THE PUBLIC TREASURY

RGC is obliged to strictly comply with tax regulations at both national and international level. All employees are obliged to comply with these regulations, as well as with internal tax policies. Employees must report any conduct or event that contravenes these policies.

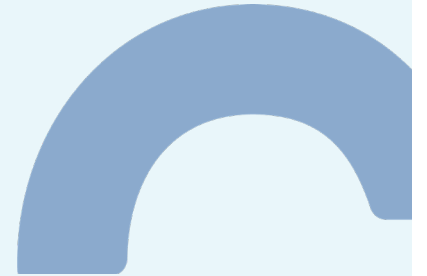
### 5.6. GUIDELINES FOR AVOIDING CONDUCT RELATED TO SOCIAL SECURITY FRAUD

RGC is committed to complying with current regulations on workers' rights and social security. All employees must comply with the regulations that affect them in this area and report any conduct that is detrimental to workers' rights and that may constitute social security fraud.





# 6 External relations



## 6. External relations

### 6.1. CORPORATE IMAGE AND REPUTATION

RGC employees undertake to protect the good name of the company in all their activities, ensuring that the image they project is in line with the Group's ethical values and sense of responsibility. Employees must behave, both personally and professionally, with dignity and integrity in all areas of their professional activity.

### 6.2. PARTICIPATION IN EXTERNAL COURSES AND SEMINARS

The participation of any employee as a speaker in external courses or seminars will require the prior authorisation of the director of their area when attending on behalf of the Group or because of the role they perform within it.

### 6.3. RELATIONSHIP WITH THE MEDIA

Employees must exercise extreme caution when communicating, either on their own initiative or at the request of third parties, any information or news about the Group or third parties to the media, and must always inform the director of the department responsible for external communications. Employees must avoid spreading comments or rumours at all times.

### 6.4. RELATIONSHIP WITH AUTHORITIES

Employees' relations with representatives of the authorities and supervisors shall

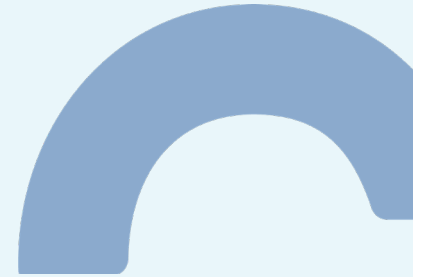
be governed by the principles of respect and collaboration within the framework of their powers, and any action tending to impede the actions of persons, bodies or companies carrying out inspections or supervision is prohibited.

### 6.5. POLITICAL OR ASSOCIATIVE ACTIVITIES

Any connection, membership or collaboration with political parties or other types of companies, institutions or associations with public purposes or purposes that exceed those of the Group, as well as any contributions or services to them, if made, must be carried out in such a way that it is clear and unequivocal that they are made on an exclusively personal basis, avoiding any possible interpretation of connection or association with RGC.

Donations or contributions to political parties made by Romar that contravene the applicable regulations on the financing of political parties are prohibited. If employees wish to accept any public office, they must first inform the area director and the Compliance Committee.

# 7 Channel for reporting, disseminating and communicating the code of conduct



## 7. Channel for reporting, disseminating and communicating the code of conduct

### 7.1. REPORTING CHANNEL

All RGC employees are responsible for their actions and shall be held accountable for any breach of the Code of Conduct, internal regulations and applicable legislation. To this end, an easy-to-use and accessible external Reporting Channel is available to employees, regulated by an internal procedure that details how reports should be made. Through this Channel, employees must report any situations of non-compliance of which they are aware. Employees may also use this Channel to make enquiries regarding the interpretation of this Code.

The Reporting Channel is a fundamental pillar of this Code of Conduct and the Crime Prevention Model, and therefore everyone should be aware of it and use it when faced with situations of non-compliance or well-founded suspicions of violations of this Code.

RGC guarantees the total confidentiality of communications made to the Reporting Channel. Once the communication has been received, it will be analysed, first externally and then internally, to clarify any possible breaches and apply the relevant disciplinary sanctions, where appropriate, without prejudice to any other liabilities that may be incurred.

The Group body responsible for analysing and assessing (provided it is not affected) the communications received will be the Compliance Committee, which must safeguard the identity of the whistleblower within the law. Reports made in good faith may under no circumstances result in retaliation against the employee.



# 8 Dissemination and breach of the code of conduct



## 8. Dissemination and breach of the code of conduct

### 8.1. DISSEMINATION AND COMMUNICATION OF THE CODE OF CONDUCT

RGC undertakes to ensure that all persons to whom the Code applies are duly informed of its existence, its content and its mandatory compliance. This Code will be published on the Group's corporate website and will be given to new employees at the time of hiring.

The "Reporting Channel" can be accessed through the following link:

- <https://romarglobalcare.com/canal-de-denuncias/>



### 8.2. NON-COMPLIANCE

Any breach of this Code of Conduct by an employee may result in the application of the internal disciplinary measures established by the Group at that time and, in any case, the labour regulations in force, without prejudice to any administrative or criminal penalties that may be applicable.





# ROMAR GLOBAL CARE group

Thank you



RGC®

ROMAR  
BODY & HOME CARE

AGRADO  
COSMETIC

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