

Code of Ethics of AENOR and of companies in its Group



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0 PREAMBLE

AENOR INTERNACIONAL, S.A.U. (hereinafter referred to as AENOR) is a commercial entity that operates in compliance assessment and other related fields, such as the formation and sale of publications, following the change of model and the restructuring of the former SPANISH STANDARDISATION AND CERTIFICATION ASSOCIATION AND CERTIFICATION carried out to ensure compliance with the provisions of Royal Decree 1072/2015 of 27 November, amending Royal Decree 2200/1995 of 28 December, approving the Infrastructure Regulations for Quality and Industrial Safety.

In the field of compliance assessment, AENOR is the leading Spanish certification body and assists companies in their expansion overseas, both in their entry into other markets and the export of their products. AENOR also plays an important role as a promoter of the culture of quality through training activities and information services.

In this scenario, AENOR and companies in its Group aim to develop a structure for regulatory and ethical compliance and corporate social responsibility adapted to the new model for the operation and provision of compliance assessment services, one that is not only in line with current regulations but also meets the strictest ethical, regulatory compliance, and corporate social responsibility standards and practices in its sector and, in general, of commercial traffic. A fundamental part of this structure is this Code of Ethics, which establishes the principles, values, and basic guidelines of the whole system.

This Code is part of the Internal System for Crime Prevention and Efforts to Combat Fraud developed by AENOR and the companies in its Group, which was prepared to ensure due compliance with parameters of care in company action, derived from article 31 bis of Organic Law 10/1990 of 23 November, approving the Penal Code, in its wording

derived from Law 5/2010 of 22 June and, in general, to promote the concept of social responsibility in the actions of AENOR and companies in its Group.¹

Everyone covered by the scope of this Code must be familiar with and comply with both the content of this Code and the values that underpin it; they must read it closely and apply it with as much rigour and diligence as possible, in order to contribute to the application of the principles, values, and social responsibility guidelines of AENOR and of companies in its Group contained in the Code.

In turn, both this Code and the rest of the Internal System for Crime Prevention and Efforts to Combat Fraud of AENOR and of companies in its Group form part of the System for Crime Prevention and Efforts to Combat Fraud of the Spanish standardisation and certification association and companies in its Group, overseen by the Commission of Corporate Responsibility (CRC) of the Spanish standardisation and certification association.

¹For the purposes of this document, the concept of the group outlined in article 42 of the Commercial Code will be applied.

1 SCOPE

This Code is applicable to governance bodies, the members of technical committees, and committees and boards constituted under the provisions of the articles of association, personnel of AENOR and of companies in its Group, members of the boards of directors of AENOR and its representatives on the boards of directors of companies in its Group, and personnel hired through other entities or as independent professionals, when they provide their services for and on behalf of AENOR or of any of the companies in its Group, irrespective of the fact that they may also be subject to other Codes of Conduct specific to the activity or line of business in which they operate.

2 VALUES

The values of AENOR and of companies in its Group are essential, durable, and fundamental principles of intrinsic importance to those at AENOR and of companies in its Group, guiding all of our actions and conduct.

These values allow us to carry out our activities in an honest and transparent manner, strengthening the ties between our entity, its environment, its personnel, and its clients and suppliers at different stages. They are binding on the professionals at AENOR and at companies in its Group, irrespective of their position and their geographic or functional location. For the purposes of this Code of Ethics, “professionals at AENOR and at companies in its Group” includes anyone with ties to AENOR or any of the companies in its Group as a result of a commercial contractual relationship or employment relationship.

These values of AENOR and of companies in its Group allow it to achieve its mission, fulfil commitments, and manage the group with excellence. These are the characteristics that give us a competitive advantage with which we obtain the resources that guarantee the stability of the entity. In this regard, we firmly believe in:

a) **People:**

The **knowledge**, energy, enthusiasm, and **commitment** that give us an edge are found within us.

We promote relationships based on **trust**, **commitment**, and **teamwork**.

We believe in personal and professional development, equality, and conciliation as drivers of progress within our organisation and among our people. We promote relationships based on trust, commitment, and teamwork.

b) Excellence:

We identify with constant improvement, carrying out our activities in an impartial, rigorous, independent, and honest manner.

We are on a constant quest for quality and excellence, always striving to exceed the expectations of our clients and stakeholders.

c) Vision for the future:

We have opted for the flexibility to adapt to evolution and new environments and for creativity, leading us to a state of constant innovation.

d) Results-oriented:

We are committed to achieving strategic and operational results, ensuring the sustainability of the organisation.

e) Commitment:

To our clients. We are their ally: We provide them with global solutions in their industrial/sectoral environment, and anticipate their requirements.

To society. We provide solutions to organisations and institutions that enable them to be more competitive, secure, and socially responsible.

To the organisation. We are passionate about what we do, and we identify with our values. We are aware of the important work we do, and are proud of it.

No-one, irrespective of their position, can request that another person violate the terms of this text, another code of AENOR or of companies in its Group, or a legal provision. Similarly, no professional will be able to cite orders from a superior or ignorance of the contents of this document to justify misconduct.

Members of the governance bodies of AENOR or of the boards of directors of companies in its Group proposed by AENOR, members of the CTCs, and professionals from AENOR, must be familiar with and comply with the content of this Code and the values that underpin it. Said persons must also comply with, and ensure compliance with, this Code and help the rest of the team in its compliance, in the knowledge that there are the channels required to refer instances of non-compliance detected within the same or (if they exist) infractions observed within AENOR or companies in its Group.

All professionals at AENOR and at companies in its Group must inform Management of the initiation, progress, and outcome of any judicial, penal, or administrative procedure of a sanctioning nature in which a professional is indicted, charged, or accused and said procedure can affect their ability to perform their functions as a professional within AENOR or within a company in its Group.

Professionals from AENOR and from companies in its Group respect the intellectual and industrial property of third parties and the right of AENOR and of companies in its Group to use their standards, training courses, procedures, projects, programs, and IT systems; telephones, terminals, manuals, videos, knowledge, processes, technology, know-how, and, in general, other projects and works development or created at AENOR or companies in its Group, whether as a result of their professional activities or those of third parties. Therefore, it is used in the course of their professional activities in the same and all material containing said property will be returned when required. The image, name, and brand of AENOR or of companies in its Group or of third parties are only used to ensure the correct performance of their professional activities.

3 INTERNAL SYSTEM FOR CRIME PREVENTION AND EFFORTS TO COMBAT FRAUD WITHIN AENOR AND COMPANIES IN ITS GROUP

To ensure full compliance with the parameters of care in company action derived from article 31 bis of Organic Law 10/1990 of 23 November, approving the Penal Code, in its wording derived from Law 5/2010 of 22 June and, in general, to promote the concept of social responsibility in the actions of AENOR and of companies in its Group, an Internal System for Crime Prevention and Efforts to Combat Fraud has been established. This system includes this Code of Ethics, which is developed in, among other documents, the “Regulations that develop the system for crime prevention and efforts to combat fraud within AENOR and companies in its Group” and the “Regulations of the Regulatory Compliance Officer of AENOR and of companies in its Group”.

4 THE CORPORATE RESPONSIBILITY COMMITTEE (CRC) OF THE SPANISH STANDARDISATION AND CERTIFICATION ASSOCIATION AND THE HEAD OF REGULATORY COMPLIANCE/COMPLIANCE OFFICER OF AENOR AND OF COMPANIES IN ITS GROUP

4.1. The Corporate Responsibility Committee (CRC) of the Spanish standardisation and certification association and of companies in its Group

The CRC is a body of the Spanish standardisation and certification association made up of members who represent the interests of the Spanish standardisation and certification association and of other companies in its Group, including AENOR and companies in its Group, to take into account the various competing interests in the group. Its aim is to learn about, develop, and guide the policies, objectives, and guidelines of the Spanish standardisation and certification association and of companies in its Group on legal issues, corporate responsibility, crime prevention, and efforts to combat fraud. It will also ensure compliance with the law within all companies in which the Spanish standardisation and certification association has a shareholding.

The specific functions of the CRC are:

- 1) To promote equality of opportunity and diversity, better work-home balance, and the development of indicators to assess the performance of the Spanish standardisation and certification association and companies in its Group in this respect.
- 2) To ensure compliance of the Spanish standardisation and certification association and of companies in its Group with the provisions of the Code of Ethics.

- 3) To contribute, within their respective areas of activity, to the investigation of communications received, the enactment of their resolutions, and the implementation of its agreements.
- 4) To develop the competencies expressly attributed to it by the Code of Ethics of the Spanish standardisation and certification association and of companies in its Group and in the “General principles to guarantee the functional separation of standardisation activities and compliance assessment” within the scope of functional separation and the management of conflicts of interest.

As a body of the Internal System for Crime Prevention and Efforts to Combat Fraud of the Spanish standardisation and certification association and of companies in its Group, it will also perform the functions expressly provided for in the regulations for the development of the Internal System for Crime Prevention and Efforts to Combat Fraud of the Spanish standardisation and certification association and of companies in its Group.

4.2. Head of Regulatory Compliance/Compliance Officer

The Head of Regulatory Compliance/Compliance Officer of AENOR and of companies in its Group, acting autonomously and independently and with control over all areas of said companies, must act as the main supervisory body for prevention, oversight, and review whose mission is to learn about, develop, and guide the policies, objectives, and guidelines of AENOR and of companies in its Group on legal issues, corporate responsibility, crime prevention, and efforts to combat fraud, oversee compliance with and the application of the Internal System for Crime Prevention and Efforts to Combat Fraud of AENOR and of companies in its Group, and inform the Board of Directors, to which it reports, of compliance with the same.

The following are functions specific to the Compliance Officer:

- 1) Ensure compliance with the provisions of this Code of Ethics of AENOR and of companies in its Group.
- 2) Contribute to the investigation of communications received, the enactment of its resolutions, and the implementation of their agreements within their respective areas of activity.
- 3) Draft (and periodically update) a compliance risk map for AENOR and companies in its Group, and inform the appropriate Board of Directors in a timely manner of the areas of risk identified, so that effective measures to oversee and control them can be put in place.
- 4) Oversee, control, and periodically assess the operation of the whole crime prevention model of AENOR and companies in its Group, in coordination with those directly responsible for the monitoring and control measures put in place.
- 5) Identify shortcomings in control or areas for improvement, promote plans of action to remedy these shortcomings and areas for improvement, and update/modify the measures and controls that form part of the system for crime prevention of AENOR and of companies in its Group.
- 6) Periodically inform the Board of Directors of the results of its activities.
- 7) Act as a coordinating body between the Internal System for Crime Prevention and Efforts to Combat Fraud of AENOR and of companies in its Group and the System for Crime Prevention and Efforts to Combat Fraud of the Spanish standardisation and certification association and companies in its Group. To this end, it may (where appropriate) participate in CRC meetings.

As a body of the Internal System for Crime Prevention and Efforts to Combat Fraud of AENOR and of companies in its Group, it will also perform the functions expressly provided for in the regulations for the development of the internal system for the prevention of crime and to combat fraud of AENOR and of companies in its Group.

5 INTERNAL REPORTING AND COMMUNICATION CHANNEL

To ensure the reporting and communication of conduct in breach of this Code of Ethics or of any law in relation to accounting, auditing, employment law, collusion, criminal offences, violations of commercial, tax, or administrative law or, in general, any supposed violation of the law by or within AENOR or companies in its Group (including instances of non-compliance with the law, legal irregularities, or any other non-compliance with internal regulations, procedures, codes, or manuals of AENOR or of companies in its Group), an internal reporting and communication channel will be put in place. This channel will guarantee the absolute confidentiality of the details of the reporting party and of the report, as well as full indemnity for the reporting party.

The instructions for use of the reporting and communication channel within AENOR and companies in its Group are set out in Annex A.

6 SOCIAL RESPONSIBILITY GUIDELINES

6.0 Fundamental principles

AENOR and companies in its Group have contributed to sustainable development in the form of social responsibility principles and practices that meet the needs and expectations of their stakeholders.

AENOR and companies in its Group, committed to the business objective of creating wealth and well-being for society, have adopted a responsible set of ethics formulated in the ten principles below. These principles will be applicable to AENOR and to companies in its Group.

Through its representatives on the boards of directors of its affiliates and subsidiaries, AENOR will promote the alignment of their values with its own so that they are consistent with the principles established in this policy and its complementary social responsibility policies.

Specifically, AENOR and companies in its Group promise to observe the following principles and practices of social responsibility, among others:

- a) AENOR and companies in its Group shall comply with current legislation in countries where they operate, adopting any international standards and guidelines where no applicable laws are in place.
- b) Corporate governance practices in line with general national, EU, and international recommendations for good governance in force, based on transparency and mutual trust with personnel, collaborators, and, where applicable, shareholders, will be adopted.
- c) Human rights will be respected, in particular those whose violation is detrimental to workers as a group; child labour and forced labour will not be accepted.

- d) A favourable industrial relations framework will be developed, based on equality of opportunity, non-discrimination, the prevention of all types of harassment, and respect for diversity, promoting a healthy and safe environment and facilitating communication with the team, with a particular focus on groups at risk of exclusion, in particular groups with special needs.
- e) Responsible practices will be developed along the value chain, with relationships with suppliers that are transparent, objective, and impartial, and based on the principles of this Code. Users will be provided with all relevant information on products and services sold.
- f) A culture of respect for the environment will be developed, reducing the environmental impact of activities, defending biodiversity, and fostering information and training in relation to this culture.
- g) Transparency and free market rules will be protected; bribery, corruption, and any other contributions made to obtain a business advantage will not be permitted. The rules of free competition will be observed at all times within AENOR and companies in its Group.
- h) Socially responsible actions will be encouraged in companies in which it has control or power of management, and fostered among its suppliers through selection and procurement processes.
- i) Channels for communication and dialogue with the various groups related to the activities of AENOR and of companies in its Group will be fostered in order to achieve harmony between association and business values and social expectations.
- j) Only relevant, true information on activities will be disseminated; it will be subject to internal and external verification procedures that guarantee its reliability and encourage its ongoing improvement.

AENOR and companies in its Group consider that the formation of relationships based on responsible corporate citizenship where they operate improves their image and reputation. For this reason, professionals from AENOR and from companies in its Group must consider the interests of local communities when carrying out their activities.

AENOR and companies in its Group consider their brand, image, and corporate reputation one of their main assets in order to protect the trust of their clients, personnel, suppliers, authorities, and society as a whole. Those who are part of AENOR or of companies in its Group must look out for and ensure the correct and appropriate use of the brand, image, and corporate reputation of AENOR.

6.1 Good tax practices

The policies and values that guide the fiscal strategy of AENOR and of companies in its Group are based on the corporate principles on which AENOR and companies in its Group are founded, and which are addressed in this Code of Ethics.

AENOR and companies in its Group will meet their tax obligations in all territories where they operate and will maintain appropriate relationships with the relevant tax authorities, complying with systems and recommendations in place in each jurisdiction as appropriate.

With the approval of this Code, the bodies of governance of AENOR and of companies in its Group define and demarcate their fiscal strategy by establishing an approach to tax matters that is also based on returns that are as compliant as possible with the principles and criteria below.

6.1.1 Fiscal strategy of AENOR and of companies in its Group:

This document sets out the fiscal strategy of AENOR and of companies in its Group set by their respective bodies of governance and communicated to the management of these companies, and the incorporation of the principles and procedures that guide the fiscal strategy of the company into its corporate governance system.

In this respect, the fiscal strategy of AENOR and of companies in its Group will be based on the principles of integrity, prudence, and transparency, which will guide the activities of the entity in relation to tax matters. It will also entail compliance with the following essential principles:

a) Legal-tax decisions made by AENOR and by companies in its Group will comply as closely as possible with laws on the payment of taxes in all jurisdictions where they operate.

b) AENOR and companies in its Group use structures that vary according to their effective economic activity and authentic value creation.

Thus, the use of opaque structures for tax purposes is prohibited. These structures will be understood to be those designed to prevent the competent tax authorities from knowing the identity of the end party responsible for the activities or the final owner of the goods or rights involved.

Operations should only be carried out in territories considered tax havens when they result in economic activity and the authentic creation of value. Results must not be transferred to these jurisdictions in order to reduce the tax burden or transparency of AENOR or of companies in its Group.

c) AENOR and companies in its Group will interpret tax regulations and, where applicable, the provisions of agreements for the avoidance of double taxation, in a reasonable manner. To this end, practices to prevent, reduce, and eliminate relevant tax risks will be encouraged.

d) AENOR and companies in its Group will have a transfer pricing policy for all transactions between related entities and parties based on the principles of free competition, value creation, and the assumption of risks and rewards.

e) AENOR and companies in its Group will actively work to adapt to the new digital environment and assume the challenges also posed by the digital economy in the area of taxation.

f) AENOR and companies in its Group will promote a relationship of reciprocal collaboration with the various tax departments with which they have dealings as a result of their operations.

This relationship will be based on the principles of transparency, mutual trust, good faith, and loyalty between the parties. To this end, AENOR and companies in its Group will adopt the following good tax practices:

— Cooperate with the competent tax authorities in the detection of, and search for, solutions to fraudulent tax practices of which AENOR and companies in its Group become aware in sectors where they have a presence.

— Provide the information and documentation for tax purposes requested by the competent tax authorities with the scope required, as soon as possible.

— Inform and discuss as appropriate with the appropriate body within the competent tax authority all factual matters of which they are aware to prepare the files in question, where appropriate. Boost, where reasonably possible and without prejudice to good business management, agreements, and compliance in the course of inspection procedures.

g) Compliance with tax law and payment of the appropriate taxes will be an important part of the contribution made by AENOR and companies in its Group to the economy or economies where they operate.

h) AENOR and companies in its Group will promote follow-up on recommendations in codes for good tax practice implemented in other countries where they operate, adapting them to specific needs and circumstances.

i) The principles that govern the activities of AENOR and of companies in its Group in the legal-tax sphere will be enacted by the appropriate tax unit in the organisation. This unit will determine the mechanisms and systems for control and preceptive internal standards to ensure compliance with current tax regulations and the principles above.

This operation will include all jurisdictions where AENOR and companies in its Group are present, and will cover all of their activities. This will require an integrated management of their tax situation in coordination with other risks.

To this end, the competent tax units of AENOR and of companies in its Group will have the human, physical, and qualified functional resources required to achieve these objectives.

As a result, the various departments and businesses of each company will have to conduct themselves in accordance with the provisions of the internal regulations and, in particular, with the Framework Regulation for Fiscal Control. The governing bodies of AENOR and of companies in its Group will be periodically informed of compliance with this framework.

6.2 Prevention of money laundering

AENOR and companies in its Group are committed to preventing the laundering of the proceeds of illicit or criminal activities. Professionals within AENOR and companies in its Group must comply with the law, international agreements, and best practices applicable against money laundering and the financing of terrorism. In particular, they will pay special attention to:

- a) Cash payments that are unusual given the nature of the transaction, payments made by cash cheque, and payments in currencies other than that specified in the agreement or contract, or on the invoice.

- b) Payments made to or by third parties not mentioned in the relevant agreement or contract.
- c) Payments from, or charges to, an account other than that usually used for transactions with a particular person or entity, provided that the end destination of the funds transferred is unknown.
- d) Payments to persons or entities resident in tax havens, or to bank accounts opened in tax havens.
- e) Payments to entities whose shareholders or final beneficiaries cannot be identified as a result of their legal regime.
- f) One-off payments not provided for in agreements or contracts.

6.3 Environmental responsibility

To ensure the enactment of this commitment, AENOR and companies in its Group will be guided by the following basic principles of action:

- a) Fully incorporate the environment and respect for the environment in their strategy.
- b) Ensure the compatibility of economic performance and environmental protection on an ongoing basis through innovation and eco-efficiency.
- c) Incorporate the environment into decision-making processes in relation to investments and the planning and execution of operations, fostering a consideration of the environment in cost-benefit analyses.

6.4 Workplace risk prevention

With a view to integrating workplace risk prevention, AENOR and companies in its Group assume and promote the following basic principles of action:

- a) Ensure compliance with the industrial legal framework and internal regulations of each company in the AENOR Group in the area of workplace risk prevention.
- b) Incorporate workplace risk prevention in strategy and decision-making processes.

Professionals from AENOR and from companies in its Group will comply with, and ensure compliance with, current laws in the place where they operate within the framework of their respective responsibilities, in a manner consistent with the spirit and purpose of the regulations. These professionals shall fulfil all commitments and obligations assumed by the Group in its contractual relationships with third parties, and comply with customs and good practice in countries where they operate.

The management of AENOR and of companies in its Group must be familiar with the laws and regulations that affect their respective areas of activity, and ensure that the professionals who report to them receive the information and training they require to understand and fulfil the legal and regulatory obligations applicable to their respective roles.

AENOR and companies in its Group shall respect and comply with judicial and/or administrative resolutions handed down, reserving the right to appeal said decisions or resolutions before the appropriate bodies when they believe that are inconsistent with the law or contravene their interests.

6.5 Commitment to human rights

AENOR and companies in its Group have expressed their commitment to respect the human rights recognised in domestic and international law and to respect the principles that form the basis of the United Nations Global Compact, the rules on the responsibilities of companies and other commercial companies in the area of human rights of the United Nations, OECD guidelines for multinational corporations, the Tripartite Declaration on Principles for Multinational Corporation and the Social Policy of the International Labour Organisation, and documents and texts that amend or complement those referred to above.

AENOR and companies in its Group express their total rejection of child and/or forced labour and state that they will never directly or indirectly use said labour, promising to respect the freedom of association, the freedom to engage in collective bargaining, and the rights of ethnic minorities and indigenous communities in places where they operate.

6.6 Principle of non-discrimination and equality of opportunity

AENOR and companies in its Group reject discrimination based on nationality, race, colour, social origin, age, gender, marital status, sexual orientation, ideology, political opinion, religion, or any other personal, physical, or social condition of their professionals, promoting equality of opportunity among their professionals.

AENOR and companies in its Group foster equal treatment between men and women in terms of access to employment, training, promotion, and conditions of employment, as well as access to goods and services and the supply of the same.

AENOR and companies in its Group condemn all manifestations of violence,

physical, sexual, psychological, or moral harassment, abuse of authority in the workplace, and any other conduct that creates an environment that is intimidating or offensive to the individual or industrial rights of its professionals, promoting specific preventative measures to avoid the various forms of harassment.

6.7 The right to privacy

AENOR and companies in its Group respect their professionals' right to privacy in all its forms, in particular in regard to their personal, medical, ideological, and economic information.

Professionals from AENOR and from companies in its Group must use communications media, IT systems, telephone systems and, in general, any media made available to them by AENOR and by companies in its Group in accordance with the policies and criteria established for this purpose, in a responsible and professional manner.

AENOR and companies in its Group promise not to disclose personal data of their professionals except with express consent from the interested parties, when said disclosure is required as a result of a legal obligation, or to comply with judicial or administrative resolutions. Under no circumstances will personal data of their professionals be processed for purposes other than those provided for in law or in a contract.

Professionals from AENOR and from companies in its Group who, in the course of their activities, access personal data of other professionals in the Group, promise in writing to observe strict confidentiality in relation to said data.

The management of AENOR and of companies in its Group comply with the requisites stipulated in personal data protection legislation as regards communications sent by professionals under the provisions of this Code.

6.8 Presents and gifts. Efforts to prevent bribery and corruption

Professionals from AENOR and from companies in its Group, as well as members of the board of directors of AENOR and their representatives on the management bodies of companies in its Group, cannot give or receive gifts or presents in the course of their professional activities.

In exceptional circumstances, a gift may be given or received if the following circumstances are also met at the same time:

- a) The gift is of symbolic value or insignificant economic value.
- b) The gift is in recognition of a courtesy or usual service.
- c) The gift is not prohibited by law or generally accepted commercial practices.

Professionals from AENOR and from companies in its Group, as well as members of the board of directors of AENOR and their representatives on the management bodies of companies in its Group, have committed to efforts to prevent corruption and bribery. In view thereof, they cannot, whether directly through another person, offer, grant, request, or accept unwarranted benefits or advantages designed to secure a benefit for the Group, themselves, or a third party. In particular, they cannot give or receive any form of gift or commission from, or made by, any other party involved, such as public functionaries (whether Spanish or foreign), personnel from other companies, political parties, clients, providers, suppliers, and/or shareholders. Acts of bribery, which are expressly prohibited, include the offer or promise, whether direct or indirect, of any type of improper benefit or instrument to conceal said act, and influence peddling. Facilitation payments, which are expressly prohibited, include payments made to low-level functionaries to ensure that they fulfil their responsibilities.

In addition, money may not be accepted from clients or suppliers in a

personal capacity - even in the form of a loan - as an advance or in an escrow account, irrespective of loans and credit extended to professionals from AENOR or from companies in its Group by financial institutions that are clients or suppliers, and which are not involved in the activities above.

Professionals from AENOR and from companies in its Group and members of the AENOR board of directors and their representatives on management bodies of companies in its Group, cannot accept gifts that influence, could influence, or could be interpreted as a favour in decision-making.

If there are doubts as to what is acceptable, the offer must be declined or, where appropriate, queried first with the line manager. If the line manager has doubts, they must refer it to the Compliance Officer for a decision.

6.9 Conflicts of interest and the separation of functions.

The appropriate management of conflicts of interest is one of the fundamental pillars of the organisation of AENOR and of companies in its Group. This being the case, it has established the criteria and procedures to identify (and, where appropriate, manage and resolve) such conflicts and set out in detail the measures established to prevent them.

The above measures have also been put in place to ensure the correct separation of functions between standardisation and compliance assessment activities that is an essential commitment of the Spanish standardisation and certification association, AENOR, and CEIS and their respective employees, personnel, managers, board members, and members of governance bodies; and to guarantee and preserve, as per the provisions of the document “General principles to guarantee the functional separation of standardisation activities and compliance assessment”.

For the purposes of this Code, a conflict of interest is considered to exist (or could exist) in the following circumstances:

— Situations in which the personal interests of employees, personnel, managers, board members, members of governance bodies of AENOR and of companies in its Group, or persons with ties to the same as a result of their activities outside AENOR or companies in its Group, relatives, personal assets, or for any other reason, come (or could come) into direct or indirect conflict with the interests of AENOR or of companies in its Group.

For the purposes of this document, the following persons will be considered persons with ties to the interested parties:

1. Spouses or other persons with a similar sentimental relationship.
2. Ascendants, descendants, and siblings of the interested party or of their spouse and, in general, relatives of these persons up to the fourth degree of kinship or third degree of affinity.
3. Any other relatives who have lived with, or have been dependants of, the interested party for at least one year before the possible conflict of interest is identified.
4. Spouses of the ascendants, descendants, and siblings of the interested party.
5. Companies in which the interested party, whether directly or through another person, has a shareholding of 5% or more.

— Temporary or permanent situations within AENOR and companies in its Group that jeopardise the functional separation of standardisation and compliance assessment activities in accordance with the requirements set out in the document “General principles to guarantee the functional separation of standardisation activities and compliance assessment”, will also be considered conflicts of interest.

Professional decisions must be based on the best defence of the interests of AENOR and of companies in its Group, so that they are not influenced by personal or family interests, or any other private interests of professionals.

All personnel, in particular those who, in view of their position in the hierarchy and their role, find themselves in a position that could pose a conflict of interest, must report the existence of this potential conflict of interest. This potential conflict of interest will be reported to the line manager. If the line manager is unsure of how to resolve the situation, they will refer it to the Compliance Officer.

If a person responsible for managing teams and making decisions has a potential conflict of interest, this potential conflict of interest will be reported to the Compliance Officer, who will analyse and resolve the situation.

To resolve this potential conflict, the Compliance Officer must gather sufficient basic information on the type of conflict, possible alternatives to avoid it, the proportionality of the decision, the economic and objective justification for the situation and, in general, all information required to see if there is a conflict of interest and, if it does exist, if AENOR and companies in its Group will bear and accept this risk in an express authorisation if the risk can be borne by AENOR and companies in its Group.

With all of this information, the Compliance Officer will arrive at a reasoned decision in the form of an express resolution that it will communicate to the affected parties.

The Compliance Officer must keep a Record of Conflicts of Interest. This record will contain the required information used as the basis for the decision reached in relation to each conflict, available to the CRC.

In the case of members of the boards of directors or AENOR and of companies in its Group, potential conflicts of interest must be reported to the Secretariat of the Board of Directors to be studied and resolved in accordance with the provisions of the Law on Corporations, the rules contained in this Code of Ethics, and the rules of operation of the very board of directors in question.

Employees, personnel, managers, board members, and members of governance bodies must keep the relevant supervisory body informed of personal situations and situations of their related persons that could give rise to a personal conflict of interest. They can also approach the Regulatory Compliance Officer or the secretariat of the board to resolve any doubts that may arise as regards the existence of a potential conflict of interest.

Within five days of their effective incorporation, appointment, or recruitment, employees, personnel, managers, board members, and members of governance bodies must inform the relevant supervisory body of:

- Possible personal conflicts of interest involving them or persons with ties to them; and
- Any possible economic, family, or other ties to clients of AENOR or of companies in its Group.

Employees, personnel, managers, board members, and members of governance bodies must keep the information provided up to date, providing notification of any cessation of, or change in, the situation that could give rise to a conflict of interest and of the emergence of new such situations within five days of becoming aware of the same and, in any event, before adopting any decision or action affected by the conflict of interest.

When employees, personnel, managers, board members, and members of governance bodies have to adopt a decision that meets (or could meet) the conditions for a conflict of interest to exist, they must:

- In the case of board members: Inform the Secretariat of the Board of Directors. Once they have issued this communication, they must not participate in the meeting that will consider, analyse, debate, or adopt decisions in relation to the issue to which the conflict of interest refers.
- In the case of other interested parties, these parties must inform the supervisory body, to which they will also refer the question that poses the personal conflict of interest. Once they have issued this communication, the interested party must abstain from participating in consideration, analysis, discussion, or decision-making in relation to the issue to which the conflict of interest refers.

Notwithstanding the above, employees, personnel, managers, board members, and members of governance bodies will be able to participate in the deliberation and approval of any regulations, instructions, and decisions of general application.

6.10 Reserved and confidential information

As a general rule, private information the property of AENOR and of companies in its Group will be considered reserved and confidential, and will be subject to professional secrecy. The contents of this information may not be disclosed to third parties except with prior express authorisation from the competent body in each case, in the event of a legal or judicial requirement, or when required by an administrative authority.

It is the responsibility of AENOR, companies in its Group, and all of their professionals, to safeguard (and ensure that others safeguard), using all security measures available and applying procedures in place, to protect reserved and confidential information held in physical or electronic formats from any internal or external threat of unauthorised access, handling, or destruction, whether intentional or otherwise. For the purposes of this document, all persons affected by this Code of Ethics must observe strict confidentiality in relation to the content of their work in their dealings with third parties, as should persons from AENOR and from companies in its Group who should be familiar with the appropriate information. In the event of any doubt, information will be considered reserved.

Personal data will be managed at all times in accordance with laws and recommendations issued by the Spanish data protection agency. AENOR and companies in its Group comply with data protection law, protecting data entrusted to them by their clients, personnel, applicants, and third parties. AENOR and companies in its Group only use data for the effective achievement of its mission statement.

AENOR and companies in its Group guarantee the confidentiality of the data of its clients, promising not to disclose them to third parties except with their prior consent, to comply with a legal obligation, or to comply with judicial or administrative resolutions.

The personal data of clients are captured, used, and processed in such a way as to safeguard clients' right to privacy and compliance with personal data protection legislation.

Professionals from AENOR and from companies in its Group who, as a result of their activities, access personal data of clients, must protect the confidentiality of these data and comply with the provisions of personal data protection legislation to the extent applicable.

Persons affected by this Code of Ethics will not disclose reserved and confidential information; nor will they use reserved and confidential information for particular purposes if such use is in breach of this Code or any law.

Any reasonable sign of a leak and/or of private use of reserved and confidential information must be reported by those who become aware of it to their line manager or, where recommended by circumstances, to General Management.

If an employment or professional relationship comes to an end, the professional concerned will return reserved and confidential information to AENOR or to companies in its Group, including all documents and storage media and devices, as well as information stored on their computer terminal. The duty to observe professional secrecy shall remain in place.

6.11 Privileged information

Any specific information on AENOR or on companies in its Group that is not public and which, if it has or should become public, could have a significant influence on the market, is considered privileged information.

Professionals and members of management who access privileged information on AENOR or on companies in its Group cannot disclose this information to third parties, whether on their own behalf or for another party, directly or through a third party, except in the normal course of their professional activities.

6.12 External activities

Professionals from AENOR and from companies in its Group dedicate all professional capacity and personal effort required to the performance of their duties.

If there is a potential conflict of interest with AENOR or with companies in its Group (e.g. the provision of employment or professional services to companies other than those in its Group on their own behalf or for a third party) or the professional is engaged in academic activities, it must be expressly authorised in advance in writing by the line manager. If the line manager is in any doubt, it must be authorised by the Compliance Officer.

AENOR and companies in its Group respect the engagement of their professionals in social and public activities, provided that these activities do not interfere with their ability to perform their professional duties at AENOR or at companies in its Group.

Professionals' ties with, membership of, or collaboration with, political parties or other types of public entity, institution, or association are exercised in such a way that it is clear that said relationship is personal, and that it is unrelated to AENOR or to companies in its Group.

6.13 Clients

AENOR and companies in its Group promise to offer products and services of a quality consistent with requisites and standards established in law at all times.

AENOR and companies in its Group compete in the market based on the merits of their products and services. Marketing and sales activities must be based on the quality and value of the products and services provided by AENOR and companies in its Group.

Contracts with clients of AENOR and of companies in its Group are drafted in a clear and simple manner. Transparency is encouraged in pre-contractual or contractual dealings with clients and reliable information is provided on the various options available, in particular in relation to products, services, and tariffs.

All clients of AENOR and of companies in its Group receive impartial and objective treatment. Professionals at AENOR and at companies in its Group adhere to the provisions of this Code of Ethics at all times.

6.14 Members of Technical Committees

In addition to complying with the provisions of this Code as they apply to them, representatives of technical committees will:

- a) Collaborate to maximise the reputation of AENOR and of companies in its Group as companies in pursuit of their statutory objectives, promoting legal, administrative, and technical objectives that influence and have a direct impact in this regard.
- b) Promise to observe standards of respect, courtesy, and professionalism, avoiding all types of conduct that could cause moral or material harm to AENOR, companies in its Group, or other representatives of technical committees.

- c) Protect the image of AENOR and of companies in its Group, endeavouring not to engage in any conduct or attract any publicity that could be detrimental to any of the parties.

6.15 Unfair competition and the defence of competition

AENOR and companies in its Group are of the view that a free market with no practices that restrict competition improves the competitiveness of businesses, is favourable to economic growth, and increases the chances of third parties being chosen. In view thereof, they will:

- a) Guarantee that their actions are in accordance with the principle of non-discrimination, ensuring equal treatment for all and avoiding discriminatory practices.
- b) Ensure that their operations are in accordance with the principles of impartiality and independence, ensuring confidentiality at all times, thus allowing strict compliance with the Competition Act and its implementing regulations.

AENOR and companies in its Group always compete fairly and in accordance with applicable regulations, never engaging in illegal, deceptive or dishonourable advertising or advertising that denigrates their competition or third parties.

Third-party information, including information on the competition, is obtained exclusively via legal means and without violating laws that affect the market.

AENOR and companies in its Group are committed to the development of free competition for the benefit of the market, clients, consumers, and users. AENOR and companies in its Group comply with, and ensure internal compliance with, competition law, pursuing any collusion that constitutes (or could constitute) an abuse of, or obstacle to, free competition.

6.16 Lobbying

Lobbying is conducted in accordance with applicable legislation at all times. Professionals from AENOR and from companies in its Group who interact or have dealings with the government and political representatives must be familiar with and comply with current legislation and with corporate processes that govern lobbying activities. Only professionals appointed by AENOR or by companies in its Group are authorised to lobby on behalf of the entity, and must be duly registered when required under applicable regulations. Lobbying must comply with regulations established by competent authorities in each country, state, province, or region.

7 EXECUTIVES AND EMPLOYEES.

All professionals from AENOR and from companies in its Group shall ensure strict compliance with current legislation in the country where they operate and shall fulfil the commitments and obligations assumed by AENOR or by companies in its Group in their dealings with members, clients, and third parties.

In addition, all professionals from AENOR and from companies in its Group shall comply with, and ensure compliance with, all current corporate policies and procedures, including compliance with the internal control system.

Compliance with practices that were widespread or agreed to in the past does not constitute a justification for non-compliance with this Code of Ethics.

8 COMMUNICATION, DISSEMINATION, AND EVALUATION

This Code of Ethics and its implementing processes must be communicated to the parties affected, in accordance with the provisions of the regulations that implement the Internal System for Crime Prevention and Efforts to Combat Fraud at AENOR and companies in its Group.

The degree of compliance with this Code of Ethics must be assessed in accordance with the provisions of said regulations.

9 DISCIPLINARY REGIME

AENOR and companies in its Group will develop the measures required to ensure the effective application of the Code. No-one, irrespective of their level or position, will be able to request that a professional commit an act that is illegal or in contravention of this Code. In turn, no professional can justify conduct that is improper, illegal, or in contravention of this Code on the grounds that they were acting on orders from a superior.

If there are reasonable signs of the commission of an irregularity or of an act that is against the law or the standards of conduct in this Code, they will be reported to their line manager or, where recommended by circumstances, to General Management.

The identity of anyone who reports an irregular act will be considered confidential information. Said person will have full indemnity. AENOR and companies in its Group promise not to engage in any form of retaliation, whether direct or indirect, against professionals who report an alleged irregular act.

When someone at AENOR or at companies in its Group is found to have engaged in activities that contravene the provisions of a law or of this Code, the disciplinary measures provided for in the internal disciplinary system of AENOR and of companies in its Group will be applied, subject, at all times, to the punishment regime provided for in the collective agreement applicable at AENOR, companies in its Group, or in the relevant industrial legislation.

9 UPDATES

It is not the intention of this Code to reflect all of the various potential realities faced by members of personnel of AENOR and of companies in its Group. Therefore, it is not a substitute for the personal responsibility exercised by each individual when carrying out their professional activities with good judgement.

On the initiative of the board of directors or the Compliance Officer, this Code of Ethics may be reviewed and updated taking into account the report prepared on the same and suggestions and proposals provided by departments or individual professionals within AENOR and companies in its Group. Governance bodies and boards of directors, the Compliance Officer, General Management, and any department, will be able to formulate proposals for improvement and promote adaptations or updates to, or the reform of, this Code.

Any review or update that requires an amendment to the Code, even when required under national legislation in any of the countries where they operate, will require approval from the AENOR board of directors, pending the report of the General Manager.

10 ACCEPTANCE

AENOR and companies in its Group will communicate and disseminate the contents and scope of this Code to all of their employees, professionals, and collaborators. Anyone who falls within the subjective scope of this Code of Ethics has a duty to familiarise themselves and comply with it. Thus, they must accept its sustaining values and principles, whether they have expressly initialled it or not. AENOR and companies in its Group require of their employees, professionals, and collaborators the highest level of commitment to compliance with this Code.

Professionals who subsequently join AENOR or any of the companies in its Group must expressly accept the contents of this Code of Ethics in full, in particular its vision, values, and standards of conduct. This Code will be attached to the respective employment contracts as an annex.

Members of the boards of directors of AENOR and their representatives on the boards of directors of companies in its Group must sign the letter of intent attached to this Code as an annex and send it to the AENOR Compliance Officer.

ANNEX 1. Letter of intent of the Code of Ethics of AENOR and of companies in its Group

To: AENOR INTERNACIONAL, S.A.U.

Calle de Génova 6, 28004, Madrid.

Compliance Officer Mr. / Mrs. [...]

1. I confirm that I have read and understood the Code of Ethics of AENOR and of companies in its Group, and that I understand its contents in full.
2. I understand that the Code of Ethics of AENOR and of companies in its Group establishes the ethical framework and guide to conduct I am obliged to observe in the fulfilment of my role at AENOR and/or companies in its Group.
3. I express my commitment to the Code of Ethics of AENOR and of companies in its Group, which I shall use and consult to guide the conduct resulting from the fulfilment of my role at AENOR and/or companies in its Group.
4. I promise to report any act in which there is non-compliance with the Code of Ethics of AENOR and of companies in its Group, using the mechanisms described in the document itself.

In [...], on the [...]

Mr. [...]

Member of the Board of Directors of [...]

AENOR

Guidelines for use of the
reporting and
communication channel at
AENOR and companies in
its Group

Approved by the Board of Directors at
its session on 22 December 2017

PREAMBLE

These guidelines, uses, and instructions have been prepared in order to implement the reporting and communication channel within AENOR and companies in its Group within the framework of the program of the system for crime prevention and detection of the company, thus helping mitigate the risk of criminal responsibility of AENOR and of companies in its Group, in accordance with the provisions of article 31 bis, paragraph 4 of Organic Law 10/1995 of 23 November of the Penal Code.

The reporting and communication channel is a mechanism whereby anyone who falls within its scope can report presumably illicit acts or non-compliance with the Code of Ethics of AENOR or of companies in its Group or with the internal regulations, procedures, codes, or manuals of which they are aware in the performance of their professional duties.

The fundamental characteristics that define this channel for reporting and communicating presumably illicit acts are:

- The confidentiality of communications sent via the channel, even if they are not anonymous; and
- The strict prohibition of retaliation or any form of negative consequence for reporting presumably illicit acts, except for appropriate disciplinary measures if an internal investigation determines that the report is false.

OBJECTIVE SCOPE

Communications may consist of the reporting of all violations of the Code of Ethics of AENOR and of companies in its Group or of any law relating to accounting, auditing, industrial law, collusion, criminal offence, commercial, fiscal, or administrative infraction, or, in general, any violation of the law committed by or within AENOR, including violations, irregularities, or any other breaches of internal regulations, procedures, codes, or manuals of AENOR or of companies in its Group, and conduct that could constitute offences subject to disciplinary sanctions, in accordance with the provisions of the Code of Ethics of AENOR and of companies in its Group.

SUBJECTIVE SCOPE

This document is applicable to governance and management bodies, members of technical committees and of committees and boards formed under the provisions of the articles of association, personnel of AENOR and of companies in its Group, members of the board of directors of AENOR and their representatives on the management bodies of companies in its Group, and personnel hired through other entities or as independent professionals, when they provide their services for and on behalf of AENOR or of any of the companies in its Group.

THE REPORTING OF ALLEGATIONS

Allegations may be reported to the Compliance Officer of AENOR or of companies in its Group via e-mail at the following address: **canaletico@aenor.com**.

Those who report allegations must identify themselves when sending the allegation, providing at least their forename and surnames and a contact address.

Anonymous reports are not permitted; however, AENOR guarantees maximum confidentiality for the identity of the person reporting the allegation.

Allegations must contain the following information: (i) The names of the person reporting the allegation and of the person allegedly in breach, if known; (ii) a basic description of the acts reported; and (iii) information on which the suspicion of the commission of irregularities is based

CONFIDENTIALITY

Maximum confidentiality will be exercised in relation to the identity of the person reporting the allegations, irrespective of legal obligations and the protection of the corresponding rights of individuals or legal entities accused of acting in bad faith.

Anyone aware of the communications sent via the reporting and communication channel must observe professional secrecy in relation to the identity of the person reporting the allegation.

If the allegation results in the initiation of judicial or administrative proceedings, it may be necessary to disclose the identity of the person reporting the allegation to the competent judicial or administrative authority.

PROHIBITION ON RETALIATION

Persons who report an allegation in good faith will be protected from any type of discrimination or penalty as a result of reporting an allegation. The adoption of any measure that constitutes retaliation or any type of negative consequence against a professional for reporting an action that is presumably illegal or unlawful, is strictly prohibited.

The prohibition on retaliation referred to in the previous paragraph will not prevent the adoption of appropriate disciplinary measures when an internal investigation determines that the allegation is false and has been made in bad faith by the person reporting the allegation.

THE HANDLING OF COMMUNICATIONS RECEIVED

Communications will be received by the Compliance Officer, who will record them in the complaints register and conduct a preliminary evaluation to confirm that the communications received:

- Refer to possible violations of the Code of Ethics of AENOR or of companies in its Group or of any law in relation to accounting, auditing, employment law, collusion, criminal offences, violations of commercial, tax, or administrative law or, in general, any supposed violation of the law by or within AENOR (including instances of non-compliance with the law or legal irregularities or any other non-compliance with internal regulations, procedures, codes, or manuals of AENOR or of companies in its Group), and conduct that could constitute breaches subject to disciplinary sanctions.
- Are not clearly devoid of foundation and do not relate to mere personal opinions or subjective evaluations related to decisions, directives, or policies of AENOR or of companies in its Group.

If both of these conditions are not met, the Compliance Officer will shelve the allegation, providing a reasoned confirmation of this decision in the complaints register. The decision to shelve the allegation will not prevent an investigation from being opened at a later date if additional information is received.

If the allegation refers to breaches of standards or a failure to comply with legal obligations relating to ethical principles relating to equality of opportunity, respect for others, work-home balance, workplace

risk prevention, or collective rights, the Compliance Officer will send it to the Human Resources Department, which will conduct an investigation and hand down a decision in relation to the allegation.

In all other cases, the Compliance Officer will launch an internal investigation in which it will be able to collect all information and documentation they consider appropriate from any area or department of AENOR or of companies in its Group. The Compliance Officer will also be able to request any assistance they consider necessary from the departments involved. The internal investigation will at all times respect the fundamental rights of the person reported, who will be informed of the contents of the allegation and be given an opportunity to respond to the allegation and formulate a defence against it.

The departments involved, as borne out in the case, will reach a consensus with the Compliance Officer on the scope of their collaboration.

The internal investigation must be completed within one month, and can only be extended on justified grounds. Once the investigation has been completed, the Compliance Officer will resolve the case, reaching one of the following decisions: (i) Shelve the case; (ii) adopt non-disciplinary measures, including the issuance of notification to supervisory or jurisdictional bodies; and/or (iii) a proposal to adopt disciplinary measures.

The Compliance Officer will propose to the board of directors the appropriate sanctions. In exceptional circumstances, when required by the seriousness of the situation, a request can be made to the Human Resources Department to put the employee under investigation on precautionary suspension, complying with the time frames specified in the applicable industrial legislation at all times.

The Compliance Officer will inform the board of directors of the outcome of the investigation and the decision reached, providing a record of all of the above in the complaints register. Finally, the person reporting the allegation and the party allegedly in breach will be informed of the outcome and decision in accordance with the terms provided for in the point below.

DATA PROTECTION

Only the following categories of information may be collected within the framework of a complaint:

- The forenames and surnames of the parties involved in the allegation, and their respective positions.
- Information on the person reporting the allegation (forename and surnames, position, telephone number, and e-mail address).
- The allegedly illegal or irregular acts reported.
- Any supporting documentation required to investigate the conduct reported.

Personal data provided for the complaint will be processed in

accordance with applicable data protection regulations for legitimate, specific purposes relating to the investigation that could arise as a result of the allegation. These data will not be used for purposes incompatible with the above, and will be adequate and not excessive in view of the purposes stated.

Any person who has been the subject of an allegation will be informed of said circumstance, the act of which they have been accused, the departments and third parties who could be aware of said circumstance, and how to exercise their right to a defence, as well as their rights of access, amendment, cancellation, and opposition, in accordance with data protection regulations, unless the allegation relates to issues associated with the prevention of money laundering and the financing of terrorism. In this case, the provisions of article 32 of Law 10/2010 of 28 April, on the prevention of money laundering and the financing of terrorism, shall apply.

On the other hand, as well as to AENOR, where applicable, personal data contained in the facts reported can be transferred to supervisory bodies, courts, and tribunals as a consequence of the investigation being carried out. The person reporting the allegation may be summonsed.

AENOR will ensure that it adopts all technical and organisational measures required to ensure the security of data collected, in order to protect them from unauthorised disclosure or access.

The Compliance Officer will keep a record of all communications received. Nevertheless, this record will observe the precautions in relation to personal data protection listed below.

Personal data obtained or collected within the framework of the investigation will be cancelled once they are no longer required or relevant and, in any event, within no more than two months after the end of the investigation into the acts alleged in the allegation.

For the purposes of this document, cancellation will consist of the blocking of data to prevent them from being processed. The sole exception to this rule will be when these data are provided to courts and tribunals or to the relevant competent administrative authority to determine possible responsibilities and obligations during the relevant prescription periods. Once this has been done, at the end of the prescription period, these data will be deleted.

In any event, personal data relating to allegations that fall outside the scope of the reporting and communication channel, or which are unfounded (and will therefore not be investigated), will be deleted immediately.

Interested parties will be able to exercise their rights of access, amendment, cancellation, and opposition in accordance with the procedures provided for in law by sending an e-mail to datos@aenor.com.

AENOR