

ETHICAL CODE

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Approved by: Compliance Committee



CHANGE CONTROL						
Edition		Author	Changes summary	Reviewed	Approved	Date of approval
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1.0	Dec -11	Alsa	Initial version	Compliance Committee		
2.0	Dec -18	Alsa	Review by consulting BDO	Compliance Committee		
3.0	Ene-19	Alsa	Legal Services Division	Compliance Committee		
4.0	Sept-21	Alsa	Addition of improvements proposed by AENOR - Homogenisation of the Code of Ethics for its application in all countries (elimination of express references to Spanish legislation). - Updating of the Helpline. - Adaptation to the Internal Information System (Law 2/2023). - Elimination of references to NEX.	Compliance Committee	Compliance Committee	22/09/2021
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Francisco Iglesias Campos

CEO, ALSA

CEO Report

In order to ensure an ethical performance in our activity, Alsa has drawn up this Ethical Code which defines our values and principles, among others.

Actions such as the theft of company property, forgery or alteration of corporate documents, unauthorised disclosure of confidential information, etc., must be identified and reported following the channels that have been defined.

Through this Ethical Code, Alsa shows its zero tolerance to conduct that may involve breaches of the Code, of internal procedures and of current regulations. The purpose of this Code is to regulate those behaviours, actions or facts that may constitute violations both of the internal rules of the company and of the regulations or ethical codes that govern its activity, as well as to prevent situations that may damage, in any way, the reputation of Alsa. It therefore aims to guarantee honesty and transparency in the actions of anyone who maintains a business relationship with us: employees, suppliers, shareholders, consultants, contractors, business partners, etc. We are a company providing a public service, so we are even more committed to provide a good image and reputation for our customers, clients, shareholders and public administrations.

As Alsa employees, we must act with integrity and responsibility across all the company and to be a role model in ethical performance, and to further promote our Values.

Alsa Exec Team is committed to fight fraud, not only to create a climate of transparency in the management, but also to protect our assets and avoid any financial losses.

Yours faithfully,

Francisco Iglesias

CEO, Alsa

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1. INTRODUCTION TO OUR CODE

This Code sets the basis for our Compliance System. It has been designed to help us meet our commitment to ensure integrity in our daily activities. This guides us in key areas, helping us to perform our activities in accordance with the ethical regulation of the Mobico Group, as well as the applicable regulation.

Alsa's Ethical Code includes all the principles and action guidelines of a good corporate governance whose values guide the actions of all Alsa Division personnel

This Code does not include any potential situation that may take place, however it sets the principles that should inspire at all moments the behaviours of any person working for Alsa.



In case of doubt, we should submit our question to the Compliance Committee through the channel enabled for that purpose (whistleblowing.ethicspoint.com).

For this purpose, it is essential that all staff is aware of this Code and that they all meet with it in their daily activities, meeting all the principles set.

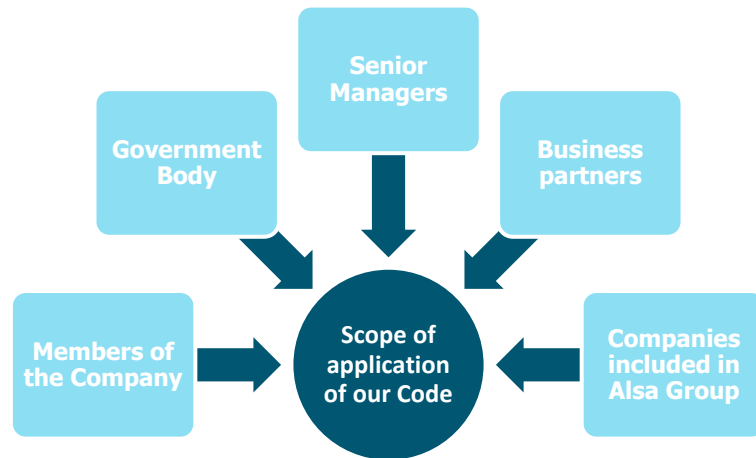
All this, without prejudice of what any internal rules of special condition may settle, and obviously, the current law into force, that will prevail in case of conflict or contradiction with this Code.

2. SCOPE OF APPLICATION OF THE POLICY

The scope of application of this Ethical Code affects all the employees, trainees, managers, directors and members of the Executive Board of Alsa and of the entities in which Alsa has a majority control.

Also, all people, both natural or legal persons, holding any kind of relationship with Alsa in the performance of their professional or business activities, including, but not limited to, external auditors, consultants, advisors, suppliers, advertisers, etc., shall be bound to the compliance of this Code.

Simply complying with the Code is not enough. We must also remember our responsibilities with others, and towards our communities, clients, shareholders, suppliers and other business partners. It is the obligation and responsibility of all employees to know this Code of Ethics.



3. OUR VALUES

Our Ethical Code is based on the five Values of Alsa; Excellence, Safety, Customers, People and Community.



Excellence

We constantly strive for excellence in everything we do.



Safety

We only do what is safe and have zero tolerance for any behaviour that puts safety at risk.



Customers

They are at the centre of everything we do, no one will work as hard as we do to satisfy all their needs.



People

We develop talent, reward excellent work and treat all employees with respect.



Community & environment

We are active in the communities in which we provide our services to help generate economic, social and environmental benefits.

4. ESSENTIAL ETHICAL PRINCIPLES

The following ETHICAL PRINCIPLES that are mandatory in the daily tasks performed within Alsa are:

I. Legality principle



The compliance with the legal order is a core mandate for Alsa in all the countries where it is present at. All employees must comply with the regulation on the legal system into force in the area where they

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work, added to the applicable internal policies of Mobico Group and Alsa. The non-compliance with the Law should be avoided under any circumstance.

Regardless the sanctions that may be applied by Law, any employee held liable for a violation of the legal system shall be subject to disciplinary consequences resulting from the infringement of his/her obligations as an employee.

Therefore, it is expected that, when dealing with clients, Public Administrations, suppliers and other partners, we act in the interest of Alsa and in accordance with the Lays and regulations resulting from its application.

II. Principle of integrity and professionalism



ALSA promotes integrity and professional skills as a leading element in the labour relations held in the company.

Professional skills in the performance of the work duties are understood as any diligent, responsible, efficient action focused on excellence, quality and innovation.

The integrity in the performance of the work duties is understood as any loyal action, performed in good faith, objective and aligned with the interests of the Organization.

Alsa reputation is based, to a large extent, on our actions and the way in which everyone of us acts and behaves. An illegal or inappropriate behaviour by just one of our employees may cause the company a significant damage. Every employee should be aware of maintaining and promoting the good reputation of Alsa in each country.

III. Principle of objectivity, impartiality and transparency in hiring suppliers



Alsa has adjusted the recruitment and hiring processes of suppliers to objectivity, impartiality and transparency criteria. This principle shall be applied in all the stages of the negotiation or signature of the commercial contracts.

For that purpose, Alsa is obliged to promote the application by several suppliers of goods and services whose characteristics and conditions offered are adjusted,

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at all times, to the needs and conditions of the company established in the contracting specifications, always assessing the most advantageous offer.

Once the supplier has been selected, Alsa legal services will draft or monitor the relevant contract, adding to it a good behaviour clause drafted by the Legal Services division.

IV. Principle of respect and equal opportunities



Alsa believes that diversity makes the Organization stronger. All, both the employees, clients, customers and suppliers, must help to create an open, engaging working environment, and ensure that both our work colleagues and the people applying for a job position in Alsa have the same opportunities. Therefore, we must not discriminate against anyone on the basis of their personal features, such as the colour of their skin, their sex, race, religion, origin, political opinion, sexual orientation, social origin, age or physical or intellectual disability, in accordance with the principles set out in our Constitution and in the rest of the legal system, as well as in the Conventions of the International Labour Organisation, in particular those relating to equal pay and non-discrimination.

V. Protecting human and labour rights and combating modern slavery



The aim of Alsa is to develop its activity with ethic and integrity, ensuring in any case the full compliance with the rights of the employees, according to the national and international applicable regulation. Alsa expressed its commitment and link with the respect of human and labour rights recognised in the national and international law, particularly in the International Labour Organization Conventions on forced labour (No. 29), freedom of association and protection of the right to organize (No. 87), the right to organize and collective bargaining (No. 98), equal remuneration (No. 100), abolition of forced labour (No. 105), non-discrimination (No. 111), minimum age (No. 138), and worst forms of child labour (No. 182).

On the other part, our parent company, Mobicco Group, as an English law company, is subject to the compliance with the current regulation since 2015 in the United Kingdom named "*Modern Slavery Act*", whose main objective is to fight against situations of slavery, traffic of human beings and forced labour. As a Division, Alsa commits to apply any measure required to ensure the

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compliance with the policy adopted, with the purpose of avoiding, in the exercise of its activity and in all the supply chain, any type of behaviour that may be classified as a form of modern slavery or traffic with human beings.

All Alsa staff shall be aware of the Modern Slavery policy when performing their activity and in any negotiation with contractors or suppliers, ensuring that these are also aware and comply with the policy. Also, employees shall report any suspicious behaviour in the company that they are aware of, through the existing channels available, particularly through the Whistle-blowing Channel enabled for these purposes, included in section 9 of this document

VI. Principle of secrecy and confidentiality



Alsa is aware of the importance of complying with the principle of secrecy and confidentiality.

Therefore, Alsa employees undersign, as one of the contract obligations, their commitment to keep the secret regarding any data or information they are aware of, as a result of their work.

As a result, all employees shall use these data or information only to perform their functions, not being allowed to provide this information to other people different from those that need to know it for the same purpose, not using it for their own benefit or third-party benefit. This secrecy obligation shall remain into force once the labour relationship with the company has been terminated.

VII. Principle of information security



Information is an essential asset for Alsa, and as a result, it requires a proper protection. Alsa recognises the importance of having its information assets duly identified and protected, avoiding their destruction, disclosure, modification and unauthorised use, and commits to develop, implement, maintain and continuously improve all information security policies, procedures, controls and organisational structures required for this purpose and to ensure that the confidentiality, integrity and availability of the information is preserved, ensuring that users have access only and exclusively to the information they require for the performance of their duties.

Therefore, all employees are responsible for keeping and ensuring the confidentiality, integrity and availability of the information assets of Alsa,

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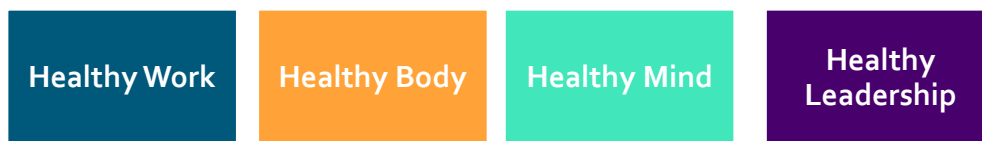
complying with all the policies and procedures included in the Information Security Management System in which we are certified

VIII. Principle of health, safety at work

Alsa commits to reach the highest levels of safety and labour health in the place of work. Alsa implements programmes, training activities and internal controls necessary for the continuous promotion of safe working practices. With these practices we aim to avoid any risk to our colleagues, customers and communities. In this regard, we should be aware and meet all the procedures and policies of safety and health at the workplace implemented, particularly the Programme Driving Out Harm.

Based on the means provided by the company, all employees are responsible for ensuring that the working environment complies with health and safety requirements, and for carrying out their activities in the most scrupulous observance of health and safety standards and policies.

"For your Health" - lines of action



Alsa has in place policies, procedures and rules for preventing accidents at the workplace and to keep safe all their employees. Also, Alsa sets in all the contracts signed with suppliers, clauses ensuring that these commit to meet and comply with the regulation in terms of prevention of occupational risks, to ensure the safety of their employees in the performance of their professional duties.

IX. Principle of environmental protection

Alsa recognises its responsibility to the global community to protect the environment and has the ambition to become an eco-efficient company. We must promote eco-efficiency in all our business activities, striving to reduce our carbon footprint and the global environmental impact. We must, then, meet with

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all the laws and regulations enforceable regarding the environment, whenever we perform our activity, trying to go the extra mile.

X. Drugs and Alcohol Principle



It is strictly forbidden to possess, distribute or consume drugs of any kind during working hours. The consumption of alcohol during working hours is not permitted. Exceptionally, alcohol may be consumed in moderation at celebrations, meals and other situations typical of the culture or customs and provided that it does not affect the performance of work-related tasks.

XI. Audits and inspections



All employees shall fully work together with the internal or external audits, investigations and enquiries conducted by the company. In addition, in the course of our business, we may be subject to investigations or requests for information by government officials or regulatory bodies. If we become aware of any potential investigation or enquiry, we must immediately notify our manager and the Legal Department before taking any action. All employees must cooperate fully and any information they provide must be truthful, clear and complete.



With respect to audits, investigations and enquiries, DO NOT:

- Destroy, alter or conceal documents in anticipation of, or in response to, a request for them.
- Provide incomplete - unless the requested information or documentation is completely unavailable -, false or misleading statements to a company investigator or public official or attempt to influence others to provide them, unless the information or documentation requested is completely unavailable.

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- Conduct an investigation on an individual basis, as the necessary and appropriate resources must be allocated to investigations.

5. SITUATIONS AGAINST THE ETHICAL CODE AND BEST PRACTICES

Our Code addresses potential ethical or legal dilemmas, but it cannot foresee all the potential situations that may arise. If we face a challenging situation, maybe the Code and the relevant procedures and policies would be enough to be a guideline. However, in more challenging situations, there may be necessary to find an additional orientation. Each of us has the responsibility to seek the necessary advice.

Therefore, any action contrary to the provisions of the following sections must be reported to the company as soon as possible, through the channels referred to in section 9 of this document.



In case of doubt, we should submit our question to the Compliance Committee through the channel enabled for that purpose (whistleblowing.ethicspoint.com).

I. Safety and legality in the operations

Any actions and/or omissions which, in the performance of the work, imply a detriment to the interests of Alsa, are considered actions contrary to the safety and legality of operations.

Employees shall protect and care for company assets in their possession or to which they have authorised access, which shall be used in a manner appropriate to the purpose of their duties for which they have been entrusted.



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Employees are obliged to comply with all applicable regulations in the fulfilment of their work duties and obligations. In this regard, as our main activity is the provision of public passenger transport services, full and strict compliance with the regulations governing road transport is of particular importance, and therefore, by way of example and not limitation, shall be considered a breach of this Code:

- Any use of the tachograph or any of its elements, the speed limiter or other instruments or control tools required to be installed on board the vehicle, with the purpose of changing how they usually work.
- The absence of the tachograph or any of its elements, the speed limiter or other instruments or control tools required to be installed on board the vehicle, with the purpose of changing how they usually work.
- The falsification of record sheets, driver's cards or any other elements or control tools that are required to be fitted on board the vehicle, as well as the falsification of their content or alteration of the aforementioned record sheets or driver's cards required in board the vehicle.
- Any unthoughtful treatment, either in word or in deed, to any user by any employee of the company in the passenger transport services.

Reportable case of non-compliance with security measures: A and B are ALSA drivers. A is aware of the fact that B gave a in offensive treatment to some passengers.

Reply: A shall report this fact either to the line manager or to the Compliance Committee through the channel enabled for that purpose (whistleblowing.ethicspoint.com).

- Not having the record sheet or the driver card in the tachograph, when it is required, or having inserted a record sheet without writing down the name and the surname of the driver, or having the record sheets or cards corresponding to another driver.
- The lack of record sheets of the tachograph, of the driver card or the documents printed required to be on board the vehicle.
- The failure to complete the manual notes regarding the driver's activity required by his/her when the tachograph is broken.
- The use of the same record sheet during several days when this may given place to the overlapping of records which prevents the reading.
- The use in the tachograph of more than a record sheet during the same day and by the same person, except when a vehicle is changed, and

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the record sheet used in the tachograph of the same vehicle is not approved to be used in the second vehicle.

- Failure to inform the company of the loss of the driving licence or any other qualification required to perform their professional duties.
- Go to work or perform professional duties after consuming alcohol or drugs.
- Any negligent or intentional conduct that endangers the physical safety or integrity of oneself or other persons (colleagues, travellers, pedestrians or other drivers, third parties in general) or company assets.

II. Corruption

Any action or omission that generates or may generate a possible situation of corruption and/or bribery must be reported to the company immediately.

By way of example and without limitation, bribery, influence peddling, etc., and other actions of similar characteristics as defined in the Criminal Code, are considered to be actions contrary to this Code.

III. Bribery

The offering or giving of a gift or any other kind of consideration to an authority, public official or person involved in the exercise of public authority to perform an act contrary to the duties inherent to his or her office or an act proper to his or her office.

A practical case of Bribery: A is a manager of an Area Unit, and he wants his company to be the winner of a tender after submitting a bid. For that purpose, he/she gives as a present to one of the civil servants some tickets to go to a music festival. Does this behaviour comply with our Ethical Code?

Reply: Absolutely not, it is one of the assumptions that go against the values of the company and this Ethical Code. Any employee aware of a situation of the like should report it with immediate effect through the channel enabled for that purpose (whistleblowing.ethicspoint.com).

IV. Traffic of influence

Influencing a public official or authority by taking advantage of any situation arising from his personal relationship with that official or with another public official or authority in order to obtain a decision that may directly or indirectly generate a financial benefit for himself or for a third party.

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V. Payoff

The promise, offer or giving, directly or indirectly, of any monetary or other inducement to a person to act or refrain from acting in breach of his obligations in order to obtain or retain an improper business transaction or advantage in the conduct of a business.

A practical case of Payoff1: A is an ALSA employee and submitted the bidding specifications to take part in a public tender. A is a friend of B, an employee in a company working in the passenger transport by road sector. A is aware that her friend's company is also going to the public tender aforementioned and she gives her 1,000 Euros to withdraw from the tender process, so A's company has more chances to win it. Is this an ethical behaviour?

Reply: no, the behaviour showed by A does not reflect the values and principles existing in ALSA. In the assumption that ALSA is aware of these actions, the relevant disciplinary system shall be applied.

A practical case of Payoff2: A is a driver of a sightseeing bus and agreed with the owner of a restaurant located out of the route to make the stops at his place in exchange for a commission for each passenger who eats at his restaurant. Does this behaviour comply with ALSA's Ethical Code?

Reply: this behaviour does not agree with the Principles and Values of ALSA; and in case you are aware of a similar situation, you shall report it to the Compliance Committee through the channel enabled for that purpose (whistleblowing.ethicspoint.com), with the purpose of being investigated and to apply the appropriate disciplinary proceeding.

VI. Economic offences

Any action or omission that generates or may generate an indication of the commission, of an economic offence according to the provisions set in the Criminal Code, provided and when there was bad faith, this situation shall be reported to the company with immediate effect.

For these purposes, economic crimes are understood to be fraud, punishable insolvency, crimes against the Public Treasury and Social Security, falsification of certificates, misappropriation and other actions of similar characteristics typified in the Criminal Code.

Given the special nature and complexity of this matter, the Compliance Committee will be at the disposal of any employee to resolve any doubts as to whether or not an act that could be classified under this category has occurred.

Practical example of Economic Offence: A suspects that a Public Administration awarded a subsidy after the falsification of the conditions required for its awarding. What A should do?

Reply: A should report to the Compliance Committee the suspicions mentioned so the Committee can conduct an investigation and makes a decision about it.

VII. Anti-competitive practices

Any action or omission that generates or may generate a potential crime of unfaithful competition, as well as any other anti-competitive practices, described in the regulation, shall be put into the knowledge of the company with immediate effect.

Only a faithful, honest competition allow the markets to develop freely.

All employees are bound by the rules of fair competition. Determining whether a case is subject to antitrust law can be difficult, mainly due to the fact that the rules may vary from country to country and from case to case. In any case, employees should not obtain competitive information through industrial espionage, bribery, theft or electronic eavesdropping, or intentionally communicate false information about competitors or their products or services.

Practical Case of Ant-Competitive practices: A attended a conference related to the transport industry and she met a former colleague there, B, who was working on a rival company. Be told A about the current plans in her company regarding the bonus applicable and the promotional plans. What A should do?

Reply: A must stop the conversation and shall not use the privileged information obtained from her former colleague. Also, she must report to the Compliance Committee the conversation held due to the potential implications this may have.

VIII. Discovery and disclosure of trade secrets

Any action or omission that generates or may generate a potential crime of discovery and disclosure of secrets (privileged information), described in the Criminal Code or applicable law, shall be put into the knowledge of the company with immediate effect.

All information referring to Alsa that has not been made public will be considers as privileged and confidential information. Inside information may be acquired as a result of an employee's position and responsibilities or involuntarily and includes non-public information such as: financial results and/or budgets, dividends, mergers or acquisitions, divestitures, contract awards or strategic

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plans, litigation information, changes in management and business contracts or relationships.

Inside information must not be published or made available to third parties without authorisation. The publication of inside information is prohibited when it is done outside the regular area of the working tasks or activities, or in the compliance with other obligations in the name of Alsa. This applies both to the information published within Alsa, and outside Alsa, including reporters, financial analysts, clients, consultants, family members or friends. In addition, employees must always ensure that resources containing inside information is maintained in a manner that prevents unauthorised access.

Practical Example of the Discovery and disclosure of trade secrets A, as an ALSA employee and the role he holds, has access to the list of ALSA customers and the prices applied to them. A friend of A is currently starting his own business, and told A that it would be very useful to have access to the prices applied to ALSA customers. What should be the proper behaviour of A to act according to the Ethical Code and the ALSA Values?

Reply: A should not disclosure the list of customers, as disclosing inside information of the company is against the provisions established in the Code of Conduct.

IX. Intellectual and industrial property, damage resulting from the improper use of work tools.

Any action or omission that generates or may generate, among other things, an alleged offence against intellectual property or damage to the company's computer system must be reported to the company immediately.

Employees shall comply with the regulation on intellectual property and the right of use corresponding to Mobico Group and/or Alsa regarding the licences projects, programmes and IT systems; equipment, technology, "know-how" and, overall, any work developed or created in Mobico Group and/or Alsa.

Employees must comply with any specific rules regulating the use of e-mail, access to Internet or other media available, and in any case shall they be used improperly.

Employees undertake to comply with their duty of secrecy and confidentiality with regard to all data and information they become aware of as a result of the normal course and fulfilment of the employment relationship, and this obligation shall remain in force even after the employment relationship with the company has ended.

6. CONFLICTS OF INTEREST

A conflict of interest is any situation in which the interests of the related persons related to Alsa may be, either directly or indirectly, different or opposite to the companies that are part of the Organization, either due to personal, professional, business reasons or otherwise; they shall comply with the provisions established in this document.

LISTING OF SOME EXAMPLES OF CONFLICTS OF INTEREST (NON-COMPREHENSIVE):

- Signing a contract in the name of Mobico Group with a supplier partially owned or managed by a family member or a personal friend.
- Working as a partner of an Alsa supplier or client.
- Conduct businesses on your own account that are similar to the work done in ALSA.
- Having a personal or economic interest in a business with ALSA.
- Obtaining a personal or economic gain -different from the wage- as a result from an agreement reached by a third party with the Mobico Group.

Alsa employees have a duty to make business decisions in the interests of Alsa, not based on their personal interest. Conflicts of interest arise when staff become involved in activities outside the scope of their competencies in the company or when they give preference to their personal interest.

Employees must inform their line manager of any personal interest that may exist in relation to the performance of their professional duties. They may not use companies with which they have business dealings as part of their activities in Alsa to enter into contracts and personal orders if this could result in any advantage for the contract or personal order.

A business relationship with, or involvement with, a competitor or customer of Alsa, or involvement in additional activities may give rise to a conflict that prevents employees from fulfilling their Alsa responsibilities. It is important that we all, in carrying out our professional activities, recognise and avoid conflicts of interest or even the appearance of a conflict of interest.



In case of doubt, we should submit our question to the Compliance Committee through the channel enabled for that purpose (whistleblowing.ethicspoint.com).

7. RULES APPLYING TO GIFTS AND HOSPITALITY

In relation to business courtesy, gifts and hospitality offered to or received from customers, suppliers and other business partners are a widespread practice to foster good relations and to show appreciation for professional treatment. In any case, this courtesy should not influence, or give the appearance of influencing, any business decision.

Under no circumstances shall gifts of cash and/or monetary securities be permitted.

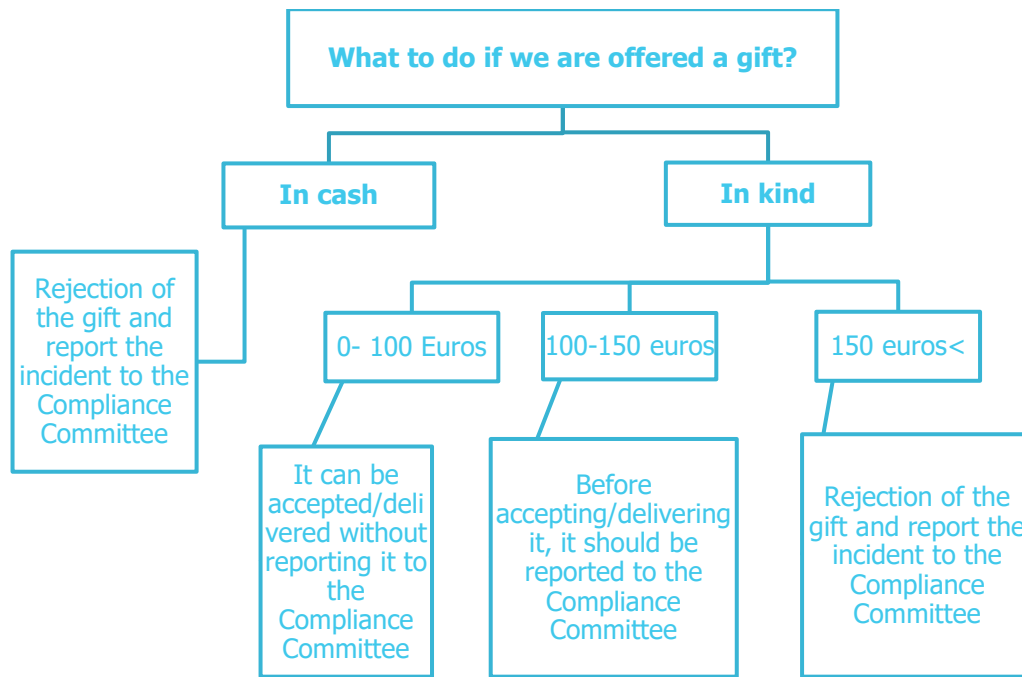
In these situations, we must be guided by good judgement, discretion and prudence.

With regard to the giving and/or receiving of gifts and/or tokens of hospitality, such as tickets to events, travel, accommodation and others, gifts and/or receipts of a **value of more than EUR 150 or the equivalent value in another currency** will not be permitted. In any case, the frequency of these gifts/hospitality will be assessed, and in case of doubt it will be consulted with the relevant line manager, the Compliance Committee or the Corporate Legal Services. To calculate these values, all gifts and hospitality received from the same third party in a period of 1 year shall be taken into account.

According to that, Alsa staff has the obligation to send to the channels we mention in the section 9 of this document e-mail address buzon.compliance@Alsa.es, information of any gift or hospitality for an amount from 100 and 150 Euros, according to the model available. This information includes both gifts (hospitality received as an employee of Alsa, and those offered to third parties, in the name of the company or in our name as Alsa employees. Only the Christmas presents are excluded, as they are arranged as a Organization.

It also applies to the assumption where the Alsa employees or managers offer gifts for an amount higher than 100 Euros.

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Scheduled of Gifts in ALSA

8. RULES APPLYING TO POLITICAL CONTRIBUTIONS AND SPONSORSHIPS

Alsa does not make **political contributions**. As a member responsible for the company, Alsa makes money donations or services for education, culture and projects of social and humanitarian interest. In the development of social action activities, external projection due diligence procedures are applied on the persons and/or entities receiving the contribution.



In ALSA it is totally prohibited to finance political parties directly (e.g. campaign financing) or indirectly (e.g. donations to foundations associated with political parties).

Alsa sponsorships in advertising are not considered as donations. Also, contributions to employer’s associations are not considered as donations, or the membership contributions to organisations serving business interests. Some donations are never allowed, including donations to (1) people and non-profit organisations; (2) made in private accounts; (3) organisations whose objectives are inconsistent to ALSA corporate principles; or (4) that may damage Alsa reputation.

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All donations shall be transparent. This implies that the identity of the recipient and the intended use of the donation must be transparent and that the reason and purpose of the donation must be justified, documented and approved according to internal rules.

A sponsorship means that any contribution made by Alsa either in cash or in kind, for an event arranged by a third-party as a compensation for advertising Alsa brand.

All sponsorships shall be transparent, by writing and for legitimate corporate objectives and proportionate -not excessive- against the pressure made by the host of the event.

9. INTERNAL INFORMATION SYSTEM

Alsa has implemented an Internal Information System (hereinafter IIS) in compliance with Law 2/2023, of 20 February, regulating the protection of persons who report breaches of regulations and the fight against corruption, which aims to ensure that any person professionally or commercially related to Alsa can, in an environment of security and absence of reprisals, raise doubts, make queries or report any alleged irregularity or act contrary to both internal and external regulations applicable to Alsa.

The IIS guarantees a secure Internal Information Channel (hereinafter IIC), enabled to guarantee the confidentiality of the identity of the informant and of the communication, and even allows anonymous reporting. The IIC has been configured by a specialised technology provider (Navex) that meets all the guarantees of independence, confidentiality, data protection and secrecy of communications required by law.

Any employee, representative or third party related to Alsa who has information relating to regulatory compliance issues that he or she has obtained in the professional or commercial sphere of the Organisation may communicate it via the following link: whistleblowing.ethicspoint.com.

This link is published on the Alsa corporate website (www.Alsa.es), in a specific section that includes a summary of the type of information that can be reported.

The following QR Code is also available to whistleblowers, which redirects directly to the website:



Communications can also be made through the telephone line (anonymously or not), which is different depending on the country where the informant is located:

- **Switzerland:** First dial the direct access number for your location: 0-800-890011 and then dial the number: 877-907-2683.
- **Spain:** 900-98-1221
- **Morocco:** 0800001155; Rabat 0800001188
- **Portugal:** First dial the direct access number for your location: 800-800-128, and then dial the number: 877-907-2683
- **France:** First dial the direct access number for your location: (i) France Telecom: 0-800-99-0011, (ii) Paris Only) 0-800-99-0111 (iii) France: 0-800-99-1011/1111/1211; and then dial the number: 877-907-2683.

All information received through the IIS will be received by the IIS Officer and the Compliance Committee, who will manage it in accordance with the provisions of the IIS Policy and the Procedure for the Management of Information Received.

10. DISCIPLINARY POLICY CONSEQUENCES OF VIOLATING THIS ETHICAL CODE

Without prejudice to the criminal effects of practices whose existence has been proven to be true, the identification by the Compliance Committee of conduct that is typified in the applicable labour legislation (Workers' Statute, Collective Bargaining Agreement or Award, etc.) as liable to sanction, shall imply the initiation by the Human Resources Division of the relevant disciplinary process against the person or persons whose involvement in such conduct has been proven.

This process will begin with the opening, when necessary, in accordance with the reference standard, of the corresponding file, and after its processing, if appropriate, the labour sanction will be applied in accordance with the law and

Ethical code (P-CP-01)

internal organisational criteria. The Company has zero tolerance to any violation to the Code. Actions or omissions that are serious or very serious infringements of the Code provisions may be considered as labour infringements, and be penalised as such according to the classification and graduation of them, regulated in the Collective Bargains applicable, or under the current legislation.

Any violation of the Code may entail, as well, the non-compliance with the current legislation, so the offenders may be declared as such from the civil, criminal and/or administrative point of view.

In any case, the Human Resources Division shall meet all legal guarantees.

11. NON-RETALIATION POLICY

Employees, Representatives, Shareholders or Third Parties who report any of the breaches provided for in article 2.1 of Law 2/2023 (Section 3.1 of the Policy published on the website), shall enjoy the protection derived from the prohibition to impose any kind of retaliation derived from the communication made, including the threat or attempt of retaliation.

Retaliation is defined as any act or omission prohibited by law that results in unfavourable treatment and disadvantages another person in the employment or professional context solely because you have reported a violation. Any act or omission that occurs during the investigation procedure or within 2 years of its completion shall be considered retaliation.

ALSA shall take, through the IIS Officer and the Compliance Committee, any measures necessary both to prevent acts that may constitute retaliation against the Whistleblower and to immediately suspend any action that may be considered retaliation and to remedy or rectify the effects of such acts. Likewise, the professional conditions of the Whistleblower must be monitored periodically in order to verify that he/she is not being treated as a reprisal.

12. COMMUNICATION AND CASCADE OF THE ETHICAL CODE

The Ethical Code will be communicated and cascaded to ALSA employees, directors and administrators. Also, so that any third parties may be aware of the content of this Ethical Code, it has been published on ALSA's corporate website (<https://www.Alsa.es/sobre-Alsa/etica-y-compliance>).

13. APPROVAL, UPDATE AND ENTRY INTO FORCE

The Ethical Code was approved by the Alsa CEO in 2010, entering into force on 1st December 2011. This version of the Ethical Code was approved by the Compliance Committee the 17th of November 2023.