

# CONSUM, S.COOP.V.

## CODE OF ETHICS AND CONDUCT

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## **1.- Introduction.**

### **1.1.- Need and Opportunity.**

1.1.1.- In today's society it is increasingly necessary for companies to establish strong, smooth, and long-lasting relationships with all of their stakeholders, and our cooperative is no exception. On the contrary, it is of vital importance in order to maintain our reputation and service capacity for our stakeholders and clients in the long term, and ultimately, to guarantee the company's long-term sustainability.

Society's technological advancement has led to substantial changes in the way of behaving within, and managing, companies. Just as a few years ago the companies themselves owned their own brands, and therefore, there was one-way communication from the company to the recipient (customer or potential customer), the same cannot be said nowadays, since without doubts or hesitation, it can be argued that the brands are of shared ownership between the company and its recipients.

This has directly and decisively contributed to the eruption of social networks as a direct form of universal communication, much more than traditional media, so it is much more important in maintaining the reputation of a brand, having to pay special attention to the reactions of the recipients (users, customers, or third parties), to interact with them, building the brand together and adapting it to the needs of those recipients.

1.1.2.- Accordingly, it is not just about acting seriously, responsibly, correctly, legally and, ultimately, ethically, but also conveying to the recipients of our work and to society in general, that our way of doing things is ethically correct. Not doing so would be a serious strategic error that may cause serious damage in the immediate future.

1.1.3.- Our cooperative has spent many years (since its foundation) operating in a socially responsible way, particularly as our legal nature involves accepting the principles of corporate social responsibility as our own, amongst them emphasising solidarity and cooperation.

This way of working has led us to adopt appropriate codes of conduct which are adapted to the times, such that since 2006 we have edited and published our Sustainability Report yearly, according to the criteria in the *Global Reporting Initiative (GRI)*, being the only company within our sector to do so. We put all our efforts into doing things this way, and in fact, we have also had our Sustainability Policy approved (agreed by the Board of Directors on 6<sup>th</sup> March 2010), that highlights our way of working and our foundations for day to day management.

For all of the above reasons, it is timely and convenient that, in addition to everything we have accomplished to date, we provide a Code of Ethics and Conduct, to further develop all of the guidelines of conduct that we have already defined in our Articles of Association, in the internal rules for working partners, in the company's collective bargaining agreement for salaried staff, in the Organisation Rules, and ultimately, in the agreements of the Annual General Meeting and the Governing Council who develop and execute these standards.

Providing a Good Corporate Governance Code is already adequate, more than 4 years after its approval and implementation, making the guidelines of conduct of all cooperative personnel more specific, so that obligations and additional rules of conduct to those which are already legal, statutory, or internal, and are regulated, in a way which closes the circle completely to be able to truthfully declare that our cooperative has the necessary and effective tools to demand that its staff (partner or salaried), at all hierarchical levels, behave in an excellent manner when it comes to relating with colleagues, suppliers, customers, and ultimately, with our stakeholders.

1.1.4.- Furthermore, since the Penal Code was modified in 2010, introducing the criminal liability of legal persons, it is not only appropriate, but totally necessary, to have written guidelines of conduct that are explicit and made public, that may be enforceable in any circumstance that the commission detects a situation that may be deemed criminal and the realisation of which may result in our cooperative being liable (regardless of the personal liability of the physical person who may have committed said act).

Article 31-bis of the Penal Code establishes the existence of a crime prevention policy ("compliance") as a cause for exemption of said liability for businesses, which implements, amongst other things, through a Code of Ethics such as this one, which is developed and adapted to the idiosyncrasies of our company, everything that cannot be done under any circumstance which implies an infringement of the law, establishing suitable sanctions, in the applicable legal framework, a policy which must include as an essential tool, the corresponding "complaint channel" (that guarantees confidentiality, that does not give anonymity to the person who makes it) and the creation of an Ethics Committee, as well as a person responsible for the compliance of the Code and other concordant regulations (Compliance Officer).

1.1.5.- Therefore and, consequently, the approval of this Code complies, not just with the timelines and suitability, in line with the Sustainability Policy and maintaining good relationships with stakeholders, but also with the imperative need to have a tool which, at any given time, can show that the cooperative does things properly, and can prove it. Without, as will be seen, everything contained in the Code implying only a strict compliance with legal regulations (in particular, criminal ones), but going beyond this, with the general demand for ethical behaviour throughout all of our areas of activity, regardless of hierarchical ranking.

1.1.6.- Ultimately, this Code establishes the standards that constitute the model of organisation and management of the Cooperative, whose aim in the first place, is to promote the true ethical corporate culture, and secondly and as a consequence, is to consolidate a culture of regulatory compliance.

1.1.7.- Any reference made in this Code to the worker, employee, partner, consumer, customer, consultant, manager or executive, will be understood indiscriminately as including female worker, employee, partner, consumer, customer, consultant, manager or executive. Similarly, when reference is made to an employee or worker, this will refer, indiscriminately to all personnel within the Cooperative, whether they are a working partner or a salaried employee.

## **1.2.- The Consum Code of Good Corporate Governance.**

1.2.1.- Through an agreement dated 23rd February 2012, the Governing Council of the Cooperative unanimously approved of the "Consum Code of Good Corporate Governance". Article 2 of which, establishes that the Code of Ethics should be one of the underpinnings of good corporate governance in our organisation, and it must summarise the necessary provisions for the day to day management of the organisation which must include the "principles, values and guidelines that, in line with the Code of Good Corporate Governance, everyone working at the cooperative must observe when carrying out their duties" in terms of integrity, transparency and orientation towards the common good.

1.2.2.- Defining in the Good Corporate Governance Code that the Code of Conduct or Code of Ethics is not an instrument, but an objective of our organisation, it must be based on the three fundamental pillars we have approved: a) the different Strategic Plans which are approved (as well as successive Management Plans), that will define the Management Model of the Cooperative; b) the Good Corporate Governance Code; and c) the Sustainability Policy of the Cooperative, that outlines our guidelines regarding CSR.

1.2.3.- Consequently, this Code derives from the Good Corporate Governance Code and, in the development of this, it establishes concrete guidelines that, as an organisation, all personnel must comply with in carrying out their work.

## **2.- Definition and Aim of the Code of Ethics and Conduct.**

2.1.- The "Consum Code of Ethics and Conduct" (hereafter, interchangeably, "Code of Ethics and Conduct" or "Code") constitutes the development of the Good Corporate Governance Code approved by the Board of Directors on 23<sup>rd</sup> February 2012, and establishes the action guidelines that must be observed by all "CONSUM, S.COOP.V." personnel (hereafter, interchangeably, "Consum", "Company", "Organisation" or "Cooperative") in carrying out their responsibilities, whatever the scope of these, the hierarchical level, or working condition, whether it be corporate or labour.

2.2.- The aim of this Code is to ensure and demand professional, ethical, and responsible behaviour in "Consum", as a company or entity, and of all its personnel (working partner or salaried employee), in carrying out their functions and activities in any part of the territory in which our Cooperative works, both physically, or where appropriate, digitally.

This demand is a basic element of its cooperative corporate culture, on which, not just the training, but also the personal and professional development of its employees is based. Accordingly, to this end, this Code defines the principles and values that must govern the relationships of the Cooperative with their stakeholders (working partners and employees, customer -partners, customers, product suppliers and creditors for services, franchisees and social entities).

### 2.3.- To achieve this aim, the Code:

- Supplies the knowledge and application of the cooperative and business culture of "Consum", fully based on the compliance of the applicable legal regulations, as well as on the acceptance of the sustainability and social responsibility policies, with particular attention to the compliance of human resources, fully respecting the diversity of the workers, whatever their origin, strictly prohibiting any type of discrimination.
- Establishes the principle of due diligence for the prevention, detection, and eradication of irregular conducts (not just in criminal or legal matters, but also in ethical matters, meaning, conducts that may not infringe statutory regulation but do contravene the ethical rules established by the company). To this effect, it establishes the basis for analysing the risks of the cooperative (which will involve the creation and maintenance of a "risk map" of the organisation), the definition of responsibilities in each Department, Division, Working area or business, the training of employees (partners or salaried), and where appropriate, of third parties who have a direct relationship with the cooperative, as well as the formalisation of procedures, in particular the notification and immediate elimination of irregular conduct ("complaint's channel").

- Considers the principle of criminal responsibility of legal persons, outlined in the current Spanish legal system or possible subsequent changes.

### **3.- Field of application and general principals of conduct.**

3.1.- The application of the code is mandatory to the entire cooperative, and to all those societies that may form part of the cooperative in the future and incorporate into its domain, regardless of their hierarchical position and function they carry out.

3.2.- Equally, where possible and appropriate for the formalisation of the business relationship, this Code may apply in full or in part, to any physical or legal person related to "Consum", who must formalise the relevant implementation document, with the firm commitment of the Cooperative in the application of the Code, including to third parties inasmuch as it serves to promote an ethical behaviour between the contracting parties.

3.3.- This Code will be personally communicated, and a copy given, to all members of the Governing Council, Managers, Executives, and Area Managers, as well as to any person representing "Consum" to third parties (when the nature of their relationship requires it), and all of them must formalise in writing their commitment to comply with it. Similarly, the express obligation of compliance of this Code will be specifically indicated in work contracts (for salaried employees) and in the partner contracts (for partner staff), incorporated as a clause in these contracts for personnel that come to work for "Consum" from the date this Code becomes effective, and through an annex for those who are already part of the organisation. They will receive a copy at the time they sign the contract or annex.

3.4.- For justified reasons and specific cases, the compliance of certain obligations of this Code may be exonerated, with authorisation from the Ethics Committee, who will immediately inform the Audit Control Comitee, in order for the latter to keep the proper monitoring of exemptions up to date.

3.5.- The Consum Code of Ethics and Conduct constitutes a tool which includes basic rules of behaviour to achieve an ethical commitment in the organisation, both at an internal level, and in terms of relationship with its stakeholders and is based on the following **general principles of behaviour**:

3.5.1.- In order to prevent internal fraud and involuntary errors that may occur to the greatest extent possible, "Consum" will apply in its daily activity and decisions the principle of "separation of tasks" Consequently:

- a) Purchases and records of operations related to partners and employees will always be carried out by someone other than the person who has responsibility for its maintenance, and to this end two or three people will be assigned separately to this process.
- b) All transactions related to investment must pass through the stages of approval, authorisation, implementation and registration, who's control must be under the charge of people who are independent from the Department with responsibility for the operation.
- c) Administrative software applications will have master profiles that allow the limitation of access to a single person at all stages of an economic operation.

3.5.2.- The delegation of tasks carried out through the granting of powers and awarding responsibilities to members of the Governing Council, managers, and rest of the employees is of great importance in the organisational structure of the Cooperative and has an impact on its control environment. Therefore, the following behaviour guidelines must be taken into account:

- a) The Governing Council and the Board of Directors will be required to show high duty of care when attributing or delegating responsibilities to other people.
- b) All decisions that involve delegating functions, awarding responsibilities and granting powers must always be taken at a managerial level within the Cooperative.
- c) The Powers granted must always be consistent with the delegated responsibilities and functions and the position occupied by the empowered person in the organisation.
- d) Limits must be set according to the roles of the delegated persons, with special attention to the spending powers and/or powers of signature of operations, as well as actions of higher risk.
- e) A procedure must be established to update the powers when there are organisational changes within the Cooperative, in particular, changes in roles of the empowered persons.
- f) A procedure must be established to ensure the powers are revoked when empowered persons end their relationship with the Cooperative.
- g) All workers of the organisation, in carrying out their roles, will act towards third parties in compliance with the principles of ethics and responsibility, undertaking the role of "commercial agent" in the sense that their agreements will be valid against third parties, although formally they have not been granted specific powers, but their powers derive from the competencies of their own job role.

3.5.3.- All "Consum" operations (whoever carries them out and whatever the subject) will strictly observe the current regulations in all territories in which it acts (whether by physical or electronic means) and, in all cases, will be carried out ethically and responsibly.

3.5.4.- All actions carried out by "Consum" personnel (both working partners and employees) will be in line with the literal nature of this code, and in case of doubt, will be in the spirit of the code.

3.5.5.- All persons, natural and legal (including their representatives and spokespersons), with whom "Consum" directly or indirectly maintains an economic (business or commercial), social, or work relationship will be treated with dignity, fairness and equality. Accordingly, it is vitally important to highlight that the corporate reputation of the cooperative depends, to a large extent, on the treatment dispensed by our employees (operational, managers, or directors) to spokespersons of people or companies with whom the Cooperative has a relationship, thus it is required in the widest sense that the treatment dispensed is at all times suitable and ethical.

3.5.6.- All "Consum" activities will be carried out in such a way that allows a greater protection of the environment and in a respectful way, in order to encourage the preservation of biodiversity and the sustainable management of natural resources, in compliance of the Sustainability Policy of the Cooperative.

3.6.- Principles in relation to partner staff or employed staff.



3.6.1.- Even when legally possible, "Consum" generally does not employ any person under the age of 18. There can be exceptions, depending on circumstances and duly justified reasons at the judgement of the Personnel Department, provided that the person is above 16 years of age.

3.6.2.- No person employed in the Cooperative will be subject to discrimination of race, sex, sexual orientation, religion, disability, illness, political opinion, age, nationality, gender, or any other cause which is constitutionally protected.

3.6.3.- "Consum" strictly prohibits any form of physical, sexual, psychological or verbal harassment or abuse to its employees (workers or partners), as well as any conduct that may generate an intimidating, offensive, or hostile work environment. To this effect, the Internal Relations Committee has implemented an appropriate body to deal with the complaints produced in this area.

3.6.4.- "Consum" recognises the right for salaried employees to organise, to have freedom of association and collective bargaining. The working partner has the partner-working rights recognised through the Articles of Association, Internal Regulations, and other agreements of the General Meeting and Governing Council, being the body who represents the Public Affairs Committee.

3.6.5.- The weekly working hours and overtime will not exceed the legal limit established by the legislation of each country. The overtime hours will always be voluntary and paid in accordance with the law.

3.6.6.- Both the work advance received by working partners and the salary received by the "Consum" employees is appropriate for the task or function carried out, always respecting the collective bargaining agreement (in the case of salaried employees), and the labour regulations approved for working partners by the Governing Council and other relevant regulations (Statutes and internal regulations).

Accordingly, all job roles in the Cooperative are describe and valued in the Valuation Catalogue, approved by the Governing Council, without there being any discrimination of gender or any other nature.

3.6.7.- "Consum" guarantees that all its employees carry out their work activity in safe and healthy places and conditions.

3.6.8.- "Consum" guarantees the recruitment and promotion of personnel in accordance with equality and ability criteria, and not discrimination.

### 3.7.- Principles related to Partner-Customers and Customers:

3.7.1.- "Consum", in line with the Mission of the Cooperative, is committed to satisfying all its partner-customers and customers, offering them the possibility of making a quality purchase, with variety, price and service, a high degree of excellence, and safety, based on the care and commitment of its workers.

3.7.2.- "Consum" is firmly committed to selling products in its establishments (or online) which are made ethically and responsibly by its suppliers, not permitting any of them to be manufactured using child labour or outside of the relevant labour law.

3.7.3.- Equally, "Consum", in accordance with its values, is committed to communicating with its customers and partner-customers in a clear and transparent way, to this effect, it will establish appropriate communication channels, both physical and electronic.

3.7.4.- The Cooperative, as set out in section 4.13 below, is obliged to comply at all times with the prevailing legal obligations regarding data protection when dealing with information of a personal nature of their partners and customers.

3.8.- Principles related to its partner-customers and working partners, as owners of the Cooperative:

3.8.1.-“Consum” has implemented the Social Responsibility Policy in its organisation, as an integral part of its own legal nature, and therefore, adopts the principles of the International Cooperative Alliance, in particular those of solidarity, mutual assistance and social interest, understanding these as the way of making the company sustainable over time, increasing its value day by day, and all of this in the common interest of its partners.

3.9.- Principles related to temporary business partners, suppliers and creditors:

3.9.1.- “Consum” is committed to extending the application of this Code to all persons, natural and legal, who constitute “business partners”, on an adhoc basis or continual basis, whatever the form (associate, cooperative, business), including as such franchisees.

3.9.2.- All product manufacturers who market “Consum” under the brand of the Cooperative, will be obliged to comply with the conditions that, specifically, and based on the contents of this Code, will be incorporated into the respective purchase, supply, or service provision contracts. The rest of the suppliers of goods and services will be required to comply with these conditions in as much as is applicable to them. In any case, suppliers must allow “Consum” to carry out one-off, or regular, reviews and controls in order to verify the compliance of such obligations.

### 3.10.- Principles related to Society:

3.10.1.- "Consum" is committed to the loyal collaboration and of good faith with the societies of the territories where it carries out its activity, in its widest sense, understanding by this, Public Administration (local, provincial, autonomous or national), as the associative network of which it comprises, involving, as far as possible, the local uses and customs of each one of them.

## **4.- The Consum way of working: conduct agreements and responsible practices.**

### **4.1.- Legal compliance, internal regulations, agreements and contracts.**

4.1.1.- The application of this Code may not, under any circumstances, even when there is a doubt in its interpretation, imply a breach of any current legal provision in the territory where it is applied (local, provincial, autonomous, national, or European). This must be the case, in as much as the basic premise of this Code is the compliance with the substantive law provisions, in such a way that all "Consum" employees (whatever their hierarchical level or responsibility) are required to comply with the requirements and obligations established in current legislation and for each field relevant to the carrying out of their role. In the event of doubt, the Ethics Committee or the Legal Advisor of the Cooperative must be consulted.

4.1.2.- All personnel of the Cooperative must comply with the internal regulations (Articles of Association, Internal Regulation System, Centre Regulations, General Assembly resolutions, Governing Council agreements and, according to their rank, Head Office agreements or decisions), as well as any instructions that, in carrying them out, may be issued.

The decisions taken by each employee or working partner in carrying out their role must be subject to verification (both internal and external by a third party who is assigned the role through a contract) to check compliance with the current internal regulations. Accordingly, the Cooperative is committed to putting in place the necessary means and support so that all company personnel are aware and understand the regulations, both internal and external, needed for them to carry out their roles, in particular, all those regulations which are an essential requirement in order to carry out certain tasks or roles.

4.1.3.- Any person within the organisation, regardless of their hierarchical rank or role, may notify, through the corresponding Complaints Channel that the Cooperative has implemented, any irregularity that, in their opinion, may have been committed by another person in the organisation that implies a breach of this Code. The complaint must provide all evidentiary information and documentation, and will be treated as strictly confidential, but not anonymous. In any case, for its handling, the notification must have been communicated in good faith and without pursuing any other beneficial gain for the whistle-blower or third parties.

4.1.4.- Equally, "Consum", as part of its internal regulations, adopts all agreements it adheres to, directly or through associations it is part of, and is committed to complying with them. In this respect, the Cooperative will maintain, available to all employees, a record of agreements to which it adheres.

4.1.5.- In particular, "Consum" undertakes the basic premise in its relationships with third parties, that everything it has agreed in a contract becomes part of the internal regulations of the Cooperative and, as such, its compliance is obligatory, in such a way that no person of the organisation (employee, manager or director) may decide not to comply, unless properly authorised by the Ethics Committee, after the report from the Legal Adviser.

## **4.2.- Relationships with working partners and employees.**

4.2.1.- "Consum", as a socially responsible cooperative, adopts the Sustainability Policy it has implemented in its entirety, and is committed to developing and increasing all necessary social measures for the benefit of its working partners and employees. As one of the vectors, the "social", incorporates the Corporate Social Responsibility, committing to continue producing Sustainability Reports, as well as the economic report, which will incorporate the Good Corporate Governance Report referred to in article 4.9 of the Good Corporate Governance Code.

Accordingly, "Consum" regards the people who make up the company (working partners and employees) as a key element and, as such, wholly adopts the cooperative principles, defending and promoting the compliance of human rights and work rights of people, committing itself to applying the regulations and good practices with regard to employment, health, and safety conditions in the workplace, as well as work life balance. Thus, "the Cooperative has published all of the Work Life Balance Measures, available to personnel, which will always be maintained up to date and increased as needs in this respect arise. Currently, these measures are contained in the manual named "More than 50 measures to reconcile".



4.2.2.- For their part, all personnel of the Cooperative must comply with all relevant employment regulations (legal or internal), as well as in the prevention of occupational risks, in the detection and eradication of irregularities in this area, whatever their nature. In this matter, regardless of being able to pass information regarding irregularity through the Complaints Channel, those who become aware of risk situations can contact and consult the Prevention Service, who report to the Personnel Department.

4.2.3.- In relationships with other employees, all workers (partners or not) are obliged to act with due respect and, fundamentally, with the criteria of dignity, ethics, and fairness, taking into consideration at all times the different cultural or religious sensitivities each person may have, not undertaking, or allowing others to undertake, any form of violence, bullying or abuse in the workplace, as well as discriminations on grounds of race, religion, age, nationality, gender, or any other personal or social conditions not relating to merit or capacity, with special consideration given to the incorporation into work of people with disabilities or who are disabled. Therefore, "Consum" prohibits any engagement in bullying or "mobbing", whatever the type, both vertically (hierarchically) and horizontally (between peers). In the event that a worker (partner or not) is aware of the existence of any conduct that may conflict with what is established here, as well as being able to notify through the Complaints Channel, the Internal Relations Committee is also available, through which the required steps can be carried out.

4.2.4.- All personnel of the Cooperative (partners or not) are fully responsible for strictly complying with the regulations of prevention, health, and safety in the workplace, as well as looking after their own safety and that of those they manage or who are affected by their activities.

4.2.5.- As a general statement, substance use is strictly prohibited, psychotropic or otherwise, that may affect performance in the job role, internal relationships or relationships with third parties, partner-customers or customers. The infringement of this prohibition may be considered as a very serious breach, susceptible to being sanctioned by expulsion (in the case of partners), or dismissal (in the case of salaried employees).

4.2.6.- As a general rule, hiring of workers (partners of employees) who are relatives of those already at the Cooperative is not prohibited or limited. However, they must respect the rules regarding this matter which are established by the Personnel Department and are as follows:

- a) "Relative" will be understood to mean the person tied to you by blood or to the fourth degree inclusive.
- b) Except for exemptions made by the Manager of the relevant department, two people who are related cannot be in the same workplace or carry out identical or similar functions, even when they do not have a relationship which is hierarchically dependent.
- c) When involving different roles, 2 family members cannot work in the same workplace who have hierarchical dependence, direct or indirect, over the other.
- d) When, as a result of personal circumstances, the family relationship occurs subsequently, the Personnel Department will make the necessary decisions regarding transfer of one of the affected parties to another workplace, taking into account the criteria of opportunity, proximity and performance.
- e) In particular, extra care will be taken in hiring relatives, so that the selection process they take part in is totally transparent.

4.2.7.- Internal business lunches or meals (i.e, those that involve managers and employees, between managers or between employees, for work reasons), will take place according to criteria of logic and reasonability, on the understanding that it is necessary, or at least, an opportunity or appropriate, with each Department Manager being responsible for applying logic to this rule.

4.2.8.- Even when holding the dual role of partner-employee or employee and partner-customer, Consum employees will refrain from taking part in the competitions organised by the cooperative and which are aimed exclusively at customers or partner-customers, unless the rules of the competition say otherwise, or the competition is organised alongside a supplier and this allows their participation. In particular, employees (partners or not) who form part of the judging panel to award a prize organised by the cooperative, will refrain from participating in it, even when the conditions allow them to. Furthermore, they may not use their vote to give a prize to direct family member, up to the third degree of consanguinity or affinity.

### **4.3.- Relationships with partner-customers and with customers.**

4.3.1.-In the relationships and dealings with partner-customers and customers of the Cooperative, all personnel (regardless of hierarchical level or roles) will be required to act and treat them with due consideration, respect and dignity, addressing the different cultural sensitivities that each person may have, not promoting, or allowing situations to arise of any form of discrimination on grounds of race, sex, sexual orientation, religion, age, nationality, political opinions, gender, or any other constitutionally protected concept, with excellent treatment given to people with disabilities or who are disabled.

Accordingly, the objective of this mandate is to obtain the highest level of quality, efficiency, transparency, and excellence in our service, in order to have long term relationships with our customers and partner-customers, based on trust and mutual respect. Any behaviour which doesn't comply with what is established here, may be considered as a serious breach, which may be sanctioned by expulsion (in the case of partners), or dismissal (in the case of salaried employees).

4.3.2.- In order to give the greatest and best service to its partner-customers and customers and give the products and services they sell the highest standards of safety and quality, "Consum" undertakes the essential obligation to request that the suppliers of its products implement protocols regarding health and safety, guaranteeing that all of the products sold (both in its establishments as well as in electronic format) are totally exempt from risks to health and are totally safe in their use and consumption.

In this respect, all personnel of the organisation are required to continually review and keep up to date on the regulations in this matter, and furthermore, the relevant regulations and procedures, in particular, those concerning labelling, quality and product characteristics, whether they are for food consumption or other nature.

In the case of the "own product", this is, a product sold under the "Consum" name or any other domain of the Cooperative, the Cooperative offers a double guarantee, that of the manufacturer and their own, towards to the partner-customer or customer taking on any responsibility that any error or irregularity (both in the manufacturing process as well as the marketing) may cause for the integrity or health of the user or consumer, even when it becomes clear or is proved that the sole responsibility is that of the manufacturer of the product. To avoid unnecessary setbacks and delays, "Consum" will always respond to these cases from the consumer or user, without prejudice to repeating accountability, in this case, against the supplier of the product or service.

4.3.3.- "Consum" personnel (partner or not), in their relationships with partner-customers and customers of the Cooperative, will always give the best treatment possible, and this must be the case in compliance with the content of the Mission of the Cooperative, in particular, under the mandate of "committed workers, satisfied customers". Accordingly, the personnel must pay special attention to any suggestion or request made by any customer or partner-customer, ceasing to carry out, if this is the case, and as far as reasonably possible, the task being carried out at the time of the request, to answer their request, as a commitment of the "Cooperative" to its consumers and users.

4.3.4.- All workers of the Cooperative (partners or employees) must comply with the duties entrusted to them in accordance with their job role and responsibility, effectively and efficiently, without this being able to undermine, under any circumstance, the due attention given to customers and partner-customers, and without undermining the truth or distorting information about the product or service provided. Accordingly, they must promote the products put on sale in a friendly manner without using invasive or aggressive techniques, always respecting the decision of the customer or partner-customer, without insisting when they reject or refuse.

In this promotional work of the sale, truthful and correct information will be given which is suitable to the product or service being offered to the public, using objective standards, without being able to misrepresent (or even marginally modify) its conditions or characteristics, and always offering clear information which is not misleading, and does not cause any confusion to the recipient, whether it is a customer, partner-customer, or third party.

Therefore, the Cooperative will employ in all of its promotional and advertising supports (internal in supermarkets, external on signposts or adverts, posters, magazines, promotional leaflets or any other) content that promotes a healthy image, away from stereotypes that don't match the reality of the population. As a cooperative of consumers and users that is also "Consum", it will promote good consumer habits, to benefit the population in general, this premise prevailing over the commercial sales of a given product.

Thus, the Cooperative undertakes the policy of "responsible marketing". In this way, the communication campaigns or corporate marketing carried out by the Cooperative, as well as being legal, truthful and honest, must respect consumer rights (consequently the following will be avoided at all times: a) abusing the good faith of the consumer; b) false advertising or that which could mislead the target audience), as well as those of competitors (consequently as a general rule, comparative advertising will be avoided, and in any case, plagiarism of competitors' products or services when protected by industrial or intellectual property rights is prohibited).

4.3.5.- All personnel will be required to ensure security of the transactions they carry out, both in physical shops as well as online shops, and in this respect, they will be particularly sensitive to checking the payment methods used, in order to guarantee the adequate working of these to the customer and partner-customer, as well as the tracking of billing and collection procedures, the protection of personal information of customers and partner-customers, and the prevention of fraud and money laundering. In this respect, the Cooperative will maintain the regulations on this matter constantly updated and will periodically inform its employees so that they are aware at all times of how to deal with irregularities, which, if they occur, may be the subject of notification to the Personnel Manager.

The noncompliance of this obligation may be considered a serious breach and may be sanctioned with expulsion (in the case of partners) or dismissal (in the case of employees).

4.3.6.- "Consum" is committed to explaining to its customers and partner-customers the characteristics of the products and services that, where applicable, it sells in a clear way, and in particular, ensures it gives maximum information about these products, with a particular commitment to nutritional information. Thus, the Cooperative will avoid offering products or carrying out actions that customers and customer-partners may deem as a fraud or deception, although objectively it may not be.

4.3.7.- "Consum" will always make one or various channels of communication available to its customers and partner-customers, through which they may pass their queries, complaints or grievances. These channels may be physical or electronic. The necessary effort will be made to promote the online channel, for its immediacy, speed, and ease of access.

#### **4.4.- Relationships with the competitors and the market.**

4.4.1.- "Consum" expressly states that it competes in the market in an active manner but with absolute loyalty and respect for the regulations of it. It does not allow in its personnel or its entity, under any circumstance, fraudulent, malicious, or misleading behaviour or conduct. Thus, all searches for commercial or market information (or any segment, product, or services) by "Consum" personnel must always be carried out without infringing the regulations that protect it. Therefore, all employees or partner-employees must flatly reject any information about competitors which has been obtained in a fraudulent, improper manner which infringes the regulations, agreements, or contracts, or by violating the confidentiality established by its legitimate owners.

In particular, in cases where a new employee comes to "Consum" from, or related to, other competition companies or of the sector, special care will be taken to respect, safeguard and not infringe company secrets that, for professional, working or personal reasons, the new employee may be aware of. Likewise, all "Consum" personnel will abstain from disseminating malicious or false information about competing companies of the Cooperative.

Similarly, Consum personnel may not facilitate confidential information about the Cooperative to competitors, in accordance with the contents of section 4.12.

4.4.2.- In order to guarantee the security and transparency in the relationships with third party creditors of services or products not sold in "Consum" establishments (physical or online), and to keep intact the monitoring of the operations, in general cash payments will be avoided, so they must fully adapt the Payments Policy established by the Cooperative's Finance Department. However, cash payments for small amounts or transactions will be permitted (understanding as such a maximum of three hundred euros -€300- per operation, without being able to stagger one transaction to infringe this prohibition). The Director of the Finance Department may, for justified reasons, exonerate this obligation when electronic payments are not possible (credit or debit card, transfer, cheque, IOU or any other method of payment that provides evidence thereof).

4.4.3.- Likewise, special care and control will be taken with unforeseen payments, as well as those carried out in accounts that are not the usual ones in relation to a specific organisation, company or person, and payments made to or by people, companies or entities, or accounts opened in territories classified as tax havens, as well as those carried out by organisations in which it is not possible to identify the partner, owner, or final beneficiary.

4.4.4.- In particular, payments will never be accepted from third parties, nor can payments be made to them, that are not duly included in the corresponding contract, and even if included, said payments must always be carried out electronically or by means which allow tracking, prohibiting the acceptance or payment in cash, unless authorised by the Finance Director, in accordance with the content of the previous point.

4.4.5.- All personnel of the Cooperative will demand compliance with the regulation relative to the registration process or declarations of the origin of the product, supervising the compliance of the regulations and processes established by the company in this area.

4.4.6.- In general, any payment made, either to a supplier of products not sold in the Cooperative's establishments (consumables), or to a supplier of services, must be duly documented and accompanied by the corresponding Purchase Order, in accordance with the model determined by the Finance Department.

4.4.7.- All payments made by the Cooperative will scrupulously respect the regulations in terms of payment schedule, without allowing any infringement, unless there are justified reasons. In the event that a payment needs to be made outside of the legal limit or that which is contractually agreed, it must be accompanied by a supporting document to explain the delay, issued by the creditor or the person approving the relevant payment, explaining the reasons for delay.

4.4.8.- Except for sales operations in supermarkets, in which, logically, it is usual to charge in cash for goods sold, upon the production of a simplified invoice, any other payment requested by the Cooperative regarding any economic transaction, must be carried out through a system which allows tracking (transfer, cheque, promissory note, or similar), avoiding, as far as possible, accepting cash payments, together with the relevant invoice, debit note or equivalent document.

#### **4.5.- Relationships with suppliers.**

4.5.1.- The relationship maintained by "Consum" employees with suppliers of goods and services to the Cooperative will always be lawful, respectful, transparent and ethically acceptable. Transparency means the clarity in the terms and clauses of the negotiation and the inexistence of opaque or undocumented agreements or concepts. For this purpose, in the ordering or negotiation process, suppliers and providers will be given truthful information regarding the needs that the Cooperative intends to cover with the good or service to be acquired.

4.5.2.- The selection of suppliers (of goods and services) must be carried out according to criteria of transparency, impartiality, objectivity, efficiency and effectiveness. Therefore, when it comes to selection, the price, quality, safety, and suitability of the products or services they offer must be considered. In order to make the selection decision, quality and cost criteria will be applied, avoiding favouritism or interests outside of the Cooperative, as well as any kind of influence by customers, other suppliers or third parties, who may affect the professional impartiality and objectivity. In the selection the interest of the Cooperative in obtaining the best conditions must be reconciled with the desire to maintain stable relationships with ethical and responsible suppliers.

4.5.3.- All suppliers working with "Consum" will be required to comply strictly with current regulations, both Spanish and those of the territory they originate from or have their address, or whatever is applicable. In particular, they must ensure (and be able to prove) that their companies respect human rights, as well as work rights of all employees they have contracted, also ensuring the compliance amongst the people they have subcontracted.

In particular, suppliers who want to work (and work) for the Cooperative, will be expected to comply with the following:

- a) The dignified and respectful treatment of their employees, prohibiting bullying and discrimination.
- b) The guarantee for employees that they can carry out their work in a safe, healthy and hygienic manner.
- c) Obtaining and maintaining the necessary licences, authorisations and permits to be able to carry out their activity, and in the event that this generates waste, supervise its treatment and control it according to the applicable legislation.
- d) Avoid participating in any kind of corruption, extortion or bribery.
- e) Check that the companies that work for them (by subcontracting or any other form of business of professional collaboration), comply with the relevant legal regulations and commitments promoted by this Code.

As a consequence, and wherever possible, contracts with suppliers will include clauses that oblige them to comply with what is laid out here. The Clause Model for suppliers is attached as **Annex I** of this Code.

4.5.4.- The purchasing and procurement processes (both of own products, as well as consumables or services) must be carried out strictly complying with the regulations and procedures that the Cooperative has in place at all times. For this purpose, all decisions made in this area must be sufficiently accredited (meaning they must be reasonable, justifiable, verifiable and demonstrable in the event of being reviewed by third parties or the Cooperative own bodies of control).

4.5.5.- In the recruitment processes for suppliers of goods and services that are not marketed by the Cooperative, in order for a supplier to be able to supply their products or services, they must seek prior approval, in accordance with the internal selection criteria of the Cooperative and in the light of strict compliance with the contents of this Code, this being a necessary requirement so that the supplier may provide its services or goods, including to be able to tender at any time.

For the aforementioned approval, the production or service capacity will be taken into account, as well as competitiveness on price, compliance with the safety regulations and product quality, and ethical commitment. When contracting building work of a new construction (logistics centres or new-build supermarkets, excluding renovations) or new services that did not previously exist in the Cooperative, whichever Department is going to recruit, they must always request at least two bids, including those of the suppliers.

From the bids, the one that best meets the needs of the Cooperative will be selected (according to the criteria of opportunity, cost, effectiveness, quality, safety and efficiency), without necessarily opting for the most economical, but in the event of not opting for the cheapest, the reasons for choosing another option must be duly justified.

4.5.6.- The workers of the Cooperative (partners or not), regardless of their hierarchy or rank, undertake the obligation to protect commercially sensitive information to which they have access to or are aware of because of their job post or role, relative to the conditions established by the company regarding the supply chain.

4.5.7.- No "Consum" employee (partner or not) may request from suppliers, nor accept (in the event of being offered by them), information regarding the conditions that they have established or agreed with other competing companies. Neither may they use, under any circumstance, the threat of breaking business relationships to obtain said information, which is internally considered as unauthorised.

4.5.8.- No "Consum" employee (partner or not) may offer, grant, request, or accept, directly or indirectly, gifts or handouts, favours or payments, in cash or in kind (including entertainment or leisure activities), whatever the nature, that may influence the process of decision making relating to the carrying out of their duties, unless relating to small values or amounts, understanding as such, those that, individually do not exceed fifty euros (€50) or which, added to that obtained in a one year period, do not exceed one hundred euros (€100).

In any case, it is totally prohibited to give or receive cash gifts, whatever the quantity. Any gift or handout received that contravenes the content of this Code must be immediately returned and this circumstance must be communicated to the Ethics Committee.

In the event that the return of the gifts is not reasonably possible, they must be handed in to the Personnel Department, who will issue a receipt to the communicator, entering the gift into a draw amongst the staff or for social means, in accordance with the objective criteria and opportunity.

This prohibition of offering or accepting gifts extends to close relatives of the "Consum" worker (partner or employee), understanding as such, up to the third degree of consanguinity or affinity. In this sense, special attention will be paid to summer and Christmas periods, in which it is more usual, due to social norms, to offer this type of gifts or advantages.

4.5.9.- Nevertheless, meals or "business" activities will be acceptable, as long as they comply with the requirements established below. In particular, they can be acceptable when considered appropriate and reasonable according to the circumstances, and if they are a usual form of practices and customs of business relationships, without, in any event, being able to accept meals or activities (leisure, subsistence, hotels) considered "luxury" or that may, objectively, be considered disproportionate, all of this regardless of the hierarchical rank or role of the employee in the Cooperative (partner or not).

4.5.10.- As a general rule, in relation to meal invitations, the payment of these will be made by the supplier, if carried out at the head office of the supplier, being payable by "Consum" when carried out in the vicinity of our headquarters. Invitations to sports events (football, basketball, tennis, motor racing, cycling, sailing, etc) or social events (balconies for the Fallas festival, bullfights, etc), must be avoided, as a general rule, unless they are official invitations from public institutions (Administrations or organisms dependent on themselves) Or private, or institutional representation.

In any event, the Department Manager concerned must ensure compliance of this rule, being able to exonerate it in cases they consider the attendance at the event convenient and suitable. On the other hand, as an exception, with the Department Manager's prior knowledge, in those cases where there is an option to acquire tickets through external municipalities for this type of event, the event must be paid for.

4.5.11.- The cost of business trips carried out with suppliers of the Cooperative will be paid by "Consum", and must always be authorised by the Department Manager, who may, justifiably and reasonably, make an exception to this rule, authorising that the cost be born by the supplier. In this sense, the Secretary of each Department must keep an up to date record of this kind of trip, reporting to the Personnel Department if required.

4.5.12.- In certain situations, it may be appropriate to accept a gift as long as it is in the name of "Consum" and not in an individual's own name, in which case, the Personnel Department must be informed so that the Manager can decide the destination of the gift, which may be in a draw amongst the employees (partners or not) or its donation (or equivalent cash amount) to a charitable organisation, which will be carried out by the External Relations Department. In the event of doubt regarding the suitability of accepting a gift or invitation, the person concerned must consider the matter with their Department Manager or with the Personnel Department, before accepting it or participating in the activity.

Accordingly, it is usual for suppliers to provide "samples" of the products to the buyers of them in the Cooperative, which is totally normal and the exception to any prohibition. Only when the product given is not considered a "sample" and is given as a gift, the person in receipt of it must make their Department Manager aware, so that they can arrange for it to be sent back to the warehouse, for its distribution to a point of sale, as long as it has been or can be coded. If this is not possible, it will go into a draw or donation, in accordance with the aforementioned.

4.5.13.- As a general rule, companies who are suppliers of goods or services of any Department of the Cooperative will be prevented from carrying out jobs on behalf of any employee (partner or not) privately, even when there is compensation, unless express authorisation is given by the Personnel Director or when dealing with jobs of a low economic value (understanding as such the quantity of €6000).

#### **4.6.- Relationships with franchisees.**

4.6.1.- The franchising activity carried out by the cooperative must always be done under the total respect of the following premises:

- Respect and strict compliance with legislation and the signed agreements with the franchisees.
- Truthfulness of information it supplies to each franchisee.
- Legal and proprietal independence from the franchisees. These are small and medium sized companies or physical business persons, totally autonomous and in charge of their own management, limiting Consum to providing them with a franchise model, through which, by providing "know-how", the franchisees may develop their own supermarket business, in such a way that the cooperative: a) does not have a share in ownership or the management of any franchise; b) does not advise the franchisee in terms of its business form or on how they comply with regulations of any nature; c) does not take on

any profits or losses from the franchises; d) does not take part in the management of personnel of the franchises, notwithstanding the support for training of employees, either in their own centres or other franchise centres.

- Full organisational capacity and effective management of their own company, and accordingly, their own personnel.
- Recognition of the contribution of the franchises to the success of the company and to the revitalisation of the local economy and employment.

4.6.2.- The commercial relationship with the franchisees is regulated through a franchise contract which includes all of the agreements, clauses and conditions that will govern the relationships between the two parties during their lifetime. Said agreements and conditions may be modified in mutual agreement as many times as considered necessary.

4.6.3.- The Cooperative considers it important to highlight that the franchises are loyal collaborators to achieve the social and statutory purposes of Consum, whilst through the franchises, many customers who wouldn't access the products offered by them, can do so, with similar conditions of price and equal quality.

4.6.4.- The Cooperative does not charge the franchisees any fee or royalty, fixed, initial or periodic, on the understanding that the franchisees should not bear the general costs of the cooperative.

4.6.5.- The cooperative establishes the sales prices of its goods to its franchisees in a totally transparent way, on the basis of the highest price compared with the current RRP at any time for each product, sharing this margin with the franchisee according to their purchasing loyalty.

4.6.6.- The Cooperative communicates with its franchisees, like their stakeholders, in a continuous manner without interruptions, with their own structure, the Franchise Division, integrated within the Store Management Department, which attends to the needs of every franchisee in relation to their business. The direct relationships with franchisees are carried out through the relevant Areas Managers, who periodically visit each of the franchises to take an interest in their needs and how they work, understanding the franchise relationship must be satisfactory both for the franchisor and the franchisee.

4.6.7.- The cooperative guarantees the franchisee the best training, assistance and advice, adapted to every need, continuously over time whilst the business relationship exists, and all of this will be focused on obtaining the largest and best results for the franchisee.

4.6.8.- The cooperative makes a commitment with the franchisee that, before resorting to court proceedings, to resolve disagreements according to the principles of good will and transparent negotiation.

4.6.9.- All personnel of the Cooperative, both those who associate directly with franchisees (Franchising Division) and those who associate indirectly (the rest of the Departments) must apply in their relationships, negotiations, and communications with them, the same principles applicable to relationships with suppliers (all of section 4.5 with the necessary adaptations to the different business relationship), so that relationships with franchisees are always legal, respectful, transparent, and ethically acceptable.

4.6.10.- In the same way as with suppliers, all franchisees will be required to strictly comply with the relevant, applicable regulations. Essentially, they must ensure (and be able to prove) that in their companies they respect human rights, as well as labour rights of all the employees they hire, ensuring, likewise, that subcontractors also comply. In particular, the following will be required of franchisees:

- a) The dignified and respectful treatment of their employees, prohibiting bullying and discrimination.
- b) The guarantee for employees that they can carry out their work in a safe, healthy and hygienic manner
- c) Obtaining and maintaining the necessary licences, authorisations and permits to be able to carry out their activity, and in the event that this generates waste, observe and comply with the environmental regulations according to the applicable legislation.
- d) To avoid participating in any kind of corruption, extortion or bribery.
- e) To check that the companies that work for them (by subcontracting or any other form of business or professional collaboration), comply with the relevant legal regulations and commitments promoted by this Code. Consequently, clauses will be included in franchise contracts that oblige the franchisees to comply with what is outlined here.

#### **4.7.- Relationships with Public Administrations (authorities and public officials).**

4.7.1.-“Consum” personnel will communicate with the public authorities and institutions in the places where they carry out their activities in a legal, ethical, and respectful manner, in line with the legal regulations for the prevention of corruption and bribery. The Cooperative will specifically authorise its workers (partners or not) to have a relationship with Public Administrations and their representatives. As a general rule, relationships with public officials and the Public Administrations (local, provincial, autonomous, state or European) will be the responsibility of the External Relations Department, and in terms of Licences, the Development Department.

4.7.2.- Personnel who communicate with Public Administrations and their public officials, will be required to inform their immediate superior about their meetings and contact who, where appropriate, must make the Department Manager aware, and they must comply with the applicable legal regulations and the internal regulations of the Cooperative and this Code, who must make it easy to be internally verified by third parties at the request of the Cooperative.

4.7.3.- The same general rule applies as regarding suppliers, with respect to the request, delivery, or receipt of gifts, favours or compensations for public officials or on behalf of them, whatever their nature. In any case, official gifts and small tokens of appreciation, as long as they are proportionate and reasonable, are exempt from the prohibition according to the practices, customs and traditions of the place, as long as they are transparent and given with legitimate interests, which are socially acceptable, and in general must be sporadic, avoiding that its content or reiteration may lead an independent third party to doubt the good faith of the employee or the Cooperative. Likewise, the giving or receiving of cash gifts is prohibited.

Accordingly, it will be the responsibility of each employee (partner or not) to become aware and suitably evaluate the practices and local customs in this regard, considering the interest and good reputation of the company. In case of doubt, the Personnel Director must be consulted. On the other hand, the practises regarding gifts and tokens of appreciation, although they may be usual, must be suitably informed, monitored, evaluated and recorded by the Cooperative, for which purpose there will be a record of gifts and tokens of appreciation given or received.

Presentational gifts for Government members (local, provincial, autonomous, state or European) will be acceptable, or to any other institution (public or private) during a visit to facilities or centres of the Cooperative, as long as they have been previously approved by the Personnel Department and have similar characteristics for everyone, not being of excessive value and being reasonable, understanding as such, those which do not exceed a monetary value of more than three hundred euros (€300).

4.7.4.- "Consum" personnel who communicate with the public officials and Public Administrations are prohibited from making payments (in cash or other form) or giving gifts of value (whatever their amount) to facilitate or speed up administrative processes (in particular, of licenses), and this, whatever the scope of action of the body: administrative, judicial, or in any case, official. The infringement of the provisions herein may constitute committing a serious breach sanctionable by expulsion (in the case of partners) or dismissal (in the case of employees).

4.7.5.- As a general premise, people from "Consum" who communicate with Public Administrations, whatever their scope, will avoid any action which supposes or may suppose an unfair tax advantage or which goes against the law, and likewise, they will ensure that any help requested and obtained for "Consum" is used for the purpose for which it has been drawn up, and is truthful and transparent.

4.7.6.-“Consum” personnel who attend meetings with public authorities or public officials, and is aware of any proposal made by any of the latter, urging the falsification of information, or conditions of any type to obtain contracts, subsidies, grants or allowances, must notify the Cooperative immediately through the Complaints Channel.

4.7.7.- Making financial contributions (in cash or in kind), charged to the Company, in favour of any political party, authority, public official, body, public administration or institution in general, including trade unions is prohibited, even when the current legislation allows the regular funding of political parties.

#### **4.8.- Institutional Relationships, with the Media and Social Networks.**

4.8.1.- The External Relations Department is, as a general rule, the only Department authorised to communicate with the Media (written, digital, press, radio, television) and through social networks, consequently, only they can send out press releases or public statements in the name of “Consum”, as well as managing the official social networking accounts of the Cooperative.

This authorisation may extend to any other Department, depending on the circumstances and previous approval by the General Management.

Thus, if a representative from any media source contacts a worker (partner or not) of the Cooperative to request a statement (official or unofficial) in the name of “Consum”, they must decline this request, forwarding the requestor to the External Relations Department who will take charge of this process, and where appropriate, carry it out.

Accordingly, all personnel of the Cooperative are prohibited from authorising entry of any media (whatever the medium) into the facilities of the Cooperative (and even when outside of working hours). In the event of receiving a recording request, it must be the External Relations Department who give the relevant authorisation and manage this with the people or Departments involved or affected.

4.8.2.- Making public statements or comments, whether in a business or social forum, or in the media (including those carried out on Social Networks), whether it is official or unofficial, as well as the provision of any material for publication, is reserved exclusively for people from the External Relations Department who, because of their role, have this remit.

Accordingly, except for the Managers in the scope of their role, no worker of the Cooperative (partner or not, and regardless of their hierarchical rank) may accept or participate in any public relations activity in the name of "Consum" with customers, suppliers, distributors, or other people or institutions without the prior approval of the External Relations Department.

4.8.3.- In order to guarantee that its activities do not create a conflict of interests or involuntarily divulge confidential commercial, social or business information, no worker of the Cooperative (whatever their hierarchical rank, partner or employee) may publish or make public any information (written or in electronic format: by way of example, books, articles, podcasts, webcasts, blogs, website advertisements, photographs, videos or other), give talks, interviews or make public appearances in the name of "Consum" or as a representative of them, without the prior authorisation of the Department Manager who, previously, must communicate their decision to the External Relations Department, this authorisation being of a prior and obligatory nature, regardless of whether using teams from the Cooperative or not. The Managing Director is exempt from this prohibition, as well as the Department Managers within the scope of their roles.

4.8.4.- Unless regarding advertising products or those previously given by the Cooperative itself, "Consum" personnel are prohibited from using the name, logo, brand names and other identifying elements of the Cooperative for uses which are not related to work or the role they are assigned at any given moment, even when outside of the place of work or work hours.

4.8.5.- The use of social networks by personnel of the Cooperative must be respectful and in accordance with the rules contained in this Code and, in particular, with the current Centre Regulations at all times. Consequently, no Cooperative employee (partner or not), regardless of their hierarchical rank, may use the available means of the Cooperative in social networks (official accounts) for any purpose other than that which they were assigned, consequently they must not give, through these accounts, personal opinions that are not the official position of the company. Therefore, when employees use social networks for their personal use, they must refrain from attributing official representation of the Cooperative, regardless of respecting the legal regulations and keep in mind that, even when using them for personal use, their opinions and comments can harm the image of the Cooperative. Therefore, the personal use of websites or social networks must always be outside of working hours and must not interfere with their work, role, task or performance. The use of the Cooperative's equipment and systems for personal use in external places is therefore prohibited.

4.8.6.- The following rules will be adhered to by employees of the Cooperative (partners or not), in the use of social networks:

- a) They will never act as an authorised spokesperson for "Consum".
- b) They will never talk or divulge confidential financial information or any other information not public property of the company, nor any confidential information regarding customers, partners, suppliers of products or services, or commercial or business partners of "Consum".
- c) They must remember that the standards and values of "Consum" will apply to their online activities.
- d) They will always respect the regulations regarding copyright, brands, intellectual and industrial property.

4.8.7.- Given that the mission of the Cooperative is to satisfy the needs of its stakeholders, and that between them there are all different types of political opinions, in order to maintain strict impartiality in this regard, "Consum" proclaims itself to be "apolitical", consequently no employee (partner or not) may express political opinions in the name of the Cooperative or representing it. In particular, the employees of the Cooperative (partners or not) will avoid declarations of being in favour of one political choice or another, as long as said declaration is related to their condition of employment of "Consum".

#### **4.9.- Relationships with Business Associations and Organisations.**

4.9.1.- The relationships of the Cooperative with Business Associations and Organisations (whatever their scope and representativeness, including the cooperatives) will be conducted by the External Relations Department, regardless of the relationships each Department may have with sectoral associations or organisations relating to the matters of their competence. In the conduct of said relationships, the representatives who attend each meeting in the name of "Consum" will bear in mind that all the opinions and decisions that they may adopt during the meetings will have the sole aim of the interest of the Cooperative, without any personal opinion interfering or being dominant regarding the position that the company holds as an entity.

#### **4.10.- Conflicts of interest and the exercising of other activities.**

4.10.1.- In accordance with the current cooperative legislation and with the Articles of Association and other internal regulations, both workers and working partners must avoid situations that may result in a potential conflict between personal interests and those of the cooperative. Therefore, they must refrain from representing it and intervening in or influencing the decisions made in which, directly or indirectly, themselves or a third party linked to them, may have a personal interest. Accordingly, no one may use their position or rank in the Cooperative to obtain financial or personal advantages, nor personal business opportunities or on behalf of third parties. Neither may they intervene or participate in internal or external meetings in which decisions are made which, directly or indirectly, a person in a situation of conflict of interests, may access the confidential information that affects said conflict.

4.10.2.- The Cooperative has a special sensitivity towards the protection of the private life of its personnel and, therefore, in the private and confidential domain of their decisions. On this basis, "Consum" requires all employees (partners or not), in the event of personal conflicts of interest or of their family circle arising that may compromise the necessary objectivity of professionalism of their role in the Cooperative, to make the Ethics Committee aware of this, so that, with respect to confidentiality and the privacy of the affected parties, suitable measures can be adopted to benefit both the Cooperative and the people affected.

4.10.3.- No worker (partner or employee) of "Consum" may, whilst working for the Cooperative, provide services or receive payment as a consultant, advisor, manager, employee, counsellor to another company, without express authorisation, prior to the reasoned request, of the Personnel Director. Therefore, nevertheless, the collaboration with other companies is acceptable, with prior approval from the Department Manager, as long as: a) they are not from the same sector as "Consum"; b) the roles or activity carried out does not interfere or undermine the work carried out of the Cooperative; c) that no task is carried out during the working hours of "Consum".

4.10.4.- The Cooperative will promote the following action guidelines in relation to this matter:

- a) Avoid situations that may lead to conflict between the personal interests of the partner or employee and those of the organisation or the people with whom they relate.
- b) Always act to fulfil the responsibilities of each person, with institutional loyalty and defending the interests of the organisation and the people they relate with.
- c) Base professional decisions on defending the interests of the organisation and the people they relate with, so that they are not influenced by personal relationships, by family, or any other private interests of the corresponding person.

- d) In case of doubt, the Personnel Department or Ethics Committee must be consulted, before carrying out the operation or conclusion of the business concerned, when an employee of the Cooperative (partner or not) may be affected by a conflict of interest, either themselves or due to their family up to the fourth degree of consanguinity or affinity, people with personal relationships, representatives, agents and entities controlled by the interested party.
- e) Provide the Personnel Department with all documents and clarifications they request from the person concerned and that may be affected by a conflict of interests, in order to be able to make appropriate decisions in each specific case and avoid compromising the ability of the person to act impartially.
- f) Maintain a record of potential conflicts of interests that exist in the organisation and those that may have materialised.

#### **4.11.- Use of goods and services of the Cooperative.**

4.11.1.- "Consum" employees (partners or not) have the goods, services and resources at their disposal that are assigned to them for the purpose of their job role (including, as a mere illustration, furniture, telephones, computers, photocopiers, software, internet, intranet, data storage systems, email, and other devices and equipment), and consequently they must use them efficiently, and may not use them for their own interests. In particular, no person from the organisation (unless specifically authorised by the ICT Department) may use the IT equipment at their disposal to install or download programmes, applications or contents whose use may be illegal, contravening the regulations of the Cooperative or that may damage its reputation.

In this sense, the employees must be aware that documents and information contained in technological systems and equipment regarding the Cooperative may be subject to review by the ICT department, or by third parties designated by them, when considered necessary and is permitted by the current regulations, in a way that they may monitor the activity carried out through the means facilitated to employees, all of this, according to the thorough details of the Centre Regulations.

4.11.2.- In accordance with the previous point, no employee of the Cooperative (partner or not) may:

- a) Use the resources and means provided by the organisation and made available to people for specific purposes, in an abusive way or in a way that may affect the reputation or image of the organisation.
- b) Steal, or deliberately allow a third party to steal resources from the organisation that have been entrusted to the corresponding person because of their position.
- c) Exploit, reproduce, or surrender IT systems and applications of the organisation for different purposes.
- d) Access IT systems to which the person concerned is not authorised or does not have a licence.
- e) Install, use or distribute software that may affect the security of the systems, make unauthorised copies or carry out actions that may cause a computer virus.
- f) Include offensive or defamatory statements in communications that may be carried out through the computer tools of the organisation.
- g) Divulge or communicate through any IT medium or communication medium that belongs to the organisation, illegal, defamatory sexist, obscene, abusive, pornographic or any other type of offensive information or that not authorised by law.

4.11.3.- The employees referred to (partners or not) may not make use of the Cooperative's funds or cards to pay for activities that do not pertain to their professional activity, and therefore, may not, amongst other actions, withdraw money from cash machines using the company card to finance it, even temporarily, and when refunding the amount afterwards, this constituting a breach of what is described here as a serious breach, violating the contractual good faith, susceptible to being sanctioned by expulsion (in the case of partners) or dismissed (in the case of employees).

However, there will be exceptions to this prohibition in duly justified cases, of absolute need, in which, for extraordinary circumstances, the employee finds themselves forced to use the Cooperative's card, refunding the amount afterwards, and this, provided that it is reported immediately to the relevant manager (for example, to have been left without money and not have their own card with them at the time, or their cards have expired).

#### **4.12.- Confidentiality of information.**

4.12.1.- "Consum" personnel are obliged to protect information and knowledge generated within the Cooperative, whether it belongs to the Cooperative or they safeguard it. Thus, all workers (partners or not) must abstain from using for their own benefit any data, information, or document obtained whilst carrying out their professional activity, and without being able to communicate said information to third parties, except when the current regulations require it or the Cooperative, based on a legal report, expressly authorises it. Likewise, data, information or documents of a confidential nature coming from a third-party company will not be used without written authorisation, even when said information may be used internally.

4.12.2.-“Consum” personnel are committed to maintaining confidentiality and to use in accordance with the internal regulations on the matter any data, information, or document obtained whilst carrying out their responsibilities in the Cooperative. In general, and unless otherwise stated, the information to which workers (partners or not) have access must be considered confidential and may only be used for the purposes under which it was obtained. Thus, duplicates must not be made, it must not be reproduced, or the information used for more than is necessary to carry out the tasks, and it must not be stored on devices that do not belong to the Cooperative, unless expressly authorised by the ICT Department.

This obligation of confidentiality remains once business with “Consum” has concluded and there is the obligation to return any material relating to the Cooperative that the employee holds at the time of ending their relationship with the Cooperative. For this purpose, all workers (partners or employees) must have signed the relevant confidentiality agreement, as an annex of their partnership contract or employment contract.

4.12.3.- Every person who provides their services within the Cooperative (partners or employees) are required to fully respect the regulations regarding Confidentiality of the Information that are laid down at any time, and of those they will be given due information of to take notice. “Confidential information” means any information susceptible to being revealed through words, writing, or any other medium, tangible or intangible, physical or electronic, to which the relevant person may have access in their professional activity, including, but not limited to, the following:

- a) Information related to business plans, products, or services.
- b) Information related to budgets and forecasts.
- c) Information related to patents, brands, utility models and other intellectual or industrial property rights.
- d) Computer passwords.
- e) Source codes.
- f) Information related to advertising.

4.12.4.- The duties of confidentiality relative to the handling of confidential information extends outside of working hours and lasts indefinitely, even when the working or corporate relationship has ended (unless a specified time frame is expressly agreed, or this obligation is waived)

With the aim of guaranteeing confidentiality, all employees (Partners or not) of the Cooperative Will be required to:

- a) Put in place adequate security measures and apply the procedures established to protect the reserved and confidential information, stored on hardware or electronically, against any internal or external risk of unauthorised access, manipulation or destruction, both intentional and accidental.
- b) Protect and maintain as strictly confidential the reserved and confidential information of customers, suppliers, consultants, competing companies and other companies to which people may have access.
- c) Disclose and use reserved and confidential information only for purposes that they were intended for, according to the contract or relationship they have with the Cooperative.

- d) Take the necessary measures so that the reserved and confidential information is duly protected in the event that assistance from a third party is required and it is necessary to disclose the information, signing a written contract to that effect and binding in confidentiality with all the existing legal guarantees.
- e) Maintain confidentiality regarding the content of people's work in their relationships with third parties.
- f) Communicate any evidence of any leaks of reserved and confidential information and the specific use at the time of becoming aware of it to the line manager, following the guidelines outlined in the "Data Protection" section.
- g) In the event that the employee (partner or not) needs to take information outside of the Cooperative's systems/premises to carry out work or professional tasks, to return the information immediately after completing said tasks.
- h) Reserved and confidential information must be returned to the Cooperative at the time the working or professional relationship ends by anyone in possession of it, including documents and storage mediums or devices, as well as information stored in their computer workstation, in all cases the duty of confidentiality still being applicable for those leaving the organisation.
- i) All reserved and confidential information on hardware must be saved in locked draws or cupboards, whenever leaving the Workstation, whether during working hours, or outside of them.

4.12.5.-Employees of the Cooperative (partners or not) are strictly prohibited from:

- a) Disclosing or disseminating to third parties and/or using reserved and confidential information, when doing so without due authorisation or for private use.
- b) Using reserved and confidential information fraudulently.
- c) Benefitting personally from a profit opportunity about which the people were aware when carrying out their duties.
- d) Using reserved and confidential information, wholly or in part, for a purpose other than that which was assigned according to their work.
- e) Copying, reproducing or duplicating, in full or in part, reserved and confidential information without written authorisation of the manager or ICT Department.
- f) Storing reserved and confidential information on private computers or other devices not provided by the Cooperative.
- g) Using any type of physical or electronic information or documentation in the job role, belonging to another company and that the person has obtained without consent resulting from a previous Job post.
- h) Leaving any type or form of information on top of tables or on computer screens when people leave the workplace, either during working hours or outside of them.
- i) Leaving computers, tablets, or mobile phones belonging to the Cooperative in places where they can be easily taken by third parties.
- j) Close family members or people living with the worker (partner or not) using computers, tablets, mobile phones belonging to the organisation, unless said use is residual or insignificant.

4.12.6.- In order to protect the use of the confidential or privileged information and prevent possible leaks, the following guidelines will be followed:

- a) The use of privileged information must be safeguarded, only being communicated to people when strictly necessary to be able to carry out their roles.
- b) Monitoring, access, and delivery of documents containing privileged information will be controlled.
- c) A record will be kept of names and surnames of all internal and external people of the organisation who have knowledge of privileged information and if they access it fully or in part. The register will also include the reason and date each person has had knowledge or access to said information (the record must be encrypted and with a double password)
- d) Communications and privileged information will be identified as a whole, through assigning a code name to the operation to which the privileged information refers, using this name in all communications in such a way that neither the parties involved, nor the characteristics of the operation may not be identified, marking as visible all supporting materials (documents, letters, reports, software, files, etc) that contain privileged information with the confidential term.
- e) The subject "confidential" will be used in emails, physical mail, or fax communications that are sent out.
- f) Electronic documents will be encrypted with a password that will only be known by the people who will work with the privileged information.
- g) Areas of restricted Access will be established on the computer network to stop the access of unauthorised persons to confidential documents.
- h) The robustness of the IT security measures will be checked and optimised periodically and its suitability for new techniques and methods for theft of information or identity theft.

- i) When it is necessary to deal with privileged information, a closed room will be made available as a place of work, and all members of the team who are working on this will be responsible for guaranteeing that all documents related to this work are stored in the locked room, or in a locked filing cabinet when they are not being used, as well as ensuring they do not leave any notes on board or similar mediums; when it is not possible to make such a room available, the material supports containing privileged information will be stored in a discrete place with adequate protection measures.
- j) Written documents will be marked with a reference number or a specific marking for each one of the recipients of the privileged information.
- k) Prior authorisation from the Personnel Department or ICT Department will be required in order to copy any confidential document.
- l) Security measures will be tightened when communications are carried out through mediums that may be insecure, for example, mobile phone, fax, or email.
- ll) In the event of detecting a leak or unauthorised use of privileged information, the person who has detected it must communicate this immediately through the Complaints Channel.
- m) The Personnel Department or the person in charge of the organisation will transfer information regarding the leak they have become aware of to those responsible for the issuing of the privileged information as soon as possible.
- n) The confidential documents relating to the privileged information will be destroyed by a specialised company when the disposal by own means does not guarantee complete elimination.

- o) Documents, copies, or any other written documents which make reference to the privileged information will be stored in a place that cannot be accessed by unauthorised persons, once the contracted professional services have been finalised by the sender of the information.
- p) Computer passwords of members of the team who are dealing with the privileged information must not be shared with anyone.
- q) Any computer, including working in remote mode, which does not have a suitable security system installed must not be used outside of the office.
- r) Material which is being worked on (computer screens, papers on desks) which may give information regarding the existence or content of the operation must not be left in sight of unauthorised persons.
- s) It is not permitted to make second copies of any confidential documents received.
- t) It is not permitted to talk about privileged information, even when using key names, to people who know them, or handle material containing privileged information (presentations and documents on paper or computer) in public places where it can be overheard or seen by third parties.
- u) In particular, conversations must be avoided, both in physical presence or by telephone, in areas where there is a risk of being overheard by people who should not be aware of the information, for example, lifts, taxis, restaurants, aeroplanes, trains, buses, etc.
- v) Privileged information must not be delivered to workstations that are unmanned at the time or those which can be accessed by someone other than the appropriate person.

#### **4.13.- Protection of personal data: Data Protection Officer.**

4.13.1.- "Consum" personnel must respect the personal and family privacy of all those people, employees or others, whose information they have access to because of their job or role, not being permitted to use the information for purposes other than those planned or assigned to their task or role. The authorisations for use of information must respond to specific and justified requests, so they must strictly comply with the internal and external regulations established to ensure the proper treatment of information and details given to the company by third parties, in particular when originating from physical persons.

4.13.2.- In collecting personal data from customers, partner-customers, employees, contractors, or any other person or entity with whom a contractual or other nature of relationship is maintained, all Cooperative personnel are required to obtain the appropriate consents, when necessary, and consequently, must only use information according to the authorised purpose given by the person granting said consent. Likewise, Cooperative personnel must be aware of and respect all internal procedures implemented regarding storing, keeping, and accessing information to guarantee the different levels of security required according to their nature.

4.13.3.- Any "Consum" employee (partner or not) who has proof or news of any incident related to confidentiality of information or the protection of personal information, must communicate it immediately to the Data Protection Officer.

4.13.4.- The Cooperative will provide all of its employees (partners or not), all necessary information for dealing with information of a personal nature, which will be given out by the Data Protection Officer or the person (internal or external) they designate, for which, the relevant handbook will be compiled, and must be permanently up to date.

4.13.5.- "Consum" guarantees complete confidentiality of its customer's and partner-customers' information, committing not to reveal information, except in cases where it is legally or contractually required or possible. Therefore, it will implement suitable security measures (IT or otherwise) to avoid information leaks and breaks in the chain of custody of information, committing itself, in the event that any incident in this respect occurs, to remedy the shortcoming as quickly as possible, applying the current regulations in terms of protection of data of a personal nature. Thus, "Consum" ensures they respect the rights of access, rectification, cancellation and opposition (ARCO), and for this purpose, will proceed to answer any request on this subject as quickly as possible, without using up the legally established maximum time allowed. On the other hand, the Cooperative is committed to always have formalised, updated and in effect, the relevant handling manager contracts.

4.13.6.- The Finance and ICT Departments will be in charge of ensuring the security of information that contains personal information, concerning technical aspects, whilst said task at a legal level will correspond to the External Relations Department. Both Departments will comply and ensure the rest of the organisation complies with all the points required or derived from the current regulations regarding protection of personal information, and in particular, those contained in the (EU) Regulation 2016/679 of the European Parliament and Council of the 27<sup>th</sup> April 2016, regarding the protection of physical persons in respect of the handling of personal information and the free circulation of information (The European General Data Protection Regulation) and, where applicable, regulations that substitute, complement or develop it.

4.13.7.- The Cooperative will name a Data Protection Officer, who must have the specialised legal knowledge of in this matter and will carry out the functions assigned to them in accordance with article 39 of the European General Data Protection Regulation. Given that it must be guaranteed that the aforementioned Officer does not receive instructions in terms of how to carry out their role in this area and that they are held accountable to the highest hierarchical level of the Cooperative, said appointment will fall to the person leading the External Relations Department, as long as this person has the status of a Lawyer or solicitor, with specialised and sufficient knowledge in the matter. As Department Manager and member of the Board of Directors, they will report directly to the Managing Director.

#### **4.14.- IT Security.**

4.14.1.- In order to guarantee the security of the information and communication systems of the Cooperative, the access to them must be carried out under the following guidelines:

- a) IT systems will be maintained that guarantee the controlled access of information by authorised people, wherever necessary.
- b) There must be internal procedures that ensure adjustments to accounts and authorisations of Access to people when they change job positions.
- c) Antivirus programmes and suitable protection systems must be installed on all IT equipment.
- d) When Wireless connections are used to connect to the Internet or any network, internally or externally, there should be suitable protection to avoid access by unauthorised persons or those outside the organisation.

e) Accounts and authorisations will be cancelled as soon as the relevant people end their relationship with the Cooperative.

f) Automatic locking will be activated on mobile terminals such as laptops, tablets or telephones after moments of inactivity as determined by the Personnel Department, who will coordinate with the ICT Departments.

4.14.2.- Equally, and for the identical purpose of protection, it is strictly forbidden for all personnel of the organisation to:

a) Connect to IT systems, personal computers, peripherals and other equipment belonging to the Cooperative, or install any software without the explicit authorisation of the ICT Department.

b) Install, even with authorisation from the ICT Department, any software without the necessary authorisations and licenses and in general, infringe any copyright law.

c) Change the configuration of software and/or hardware of the fixed or mobile systems of the Cooperative without the explicit authorisation of the ICT department.

d) Register to access information from other companies, in particular, customers or suppliers, without the explicit authorisation of the ICT Department.

e) Transmit, sell, or share in any form the user credentials that the Cooperative has provided them with to access the systems of the organisation or of clients, suppliers, or third parties during the performance of their duties.

f) Illegally access the information systems of third parties.

g) Manipulate, delete or destroy, without authorisation, information about the Cooperative, of its customers, or of any third party, including files, information and programmes.

- h) Exploit vulnerabilities or security failures in the information and telecommunication systems of the Cooperative or any third party, to obtain access to information and resources for those who do not have authority.
- i) Hinder or interrupt the working of external information systems, even when this situation may be beneficial to the Cooperative.
- j) Share information regarding controls implemented by the organisation in their systems with other people of the Cooperative who are not authorised, or with third parties.
- k) Hide, conceal or substitute their own identity and send emails with false information.
- l) Intentionally send emails that contain a virus or other programmes that may damage or intercept information.
- ll) Send spam or carry out any action in response to spam through the information systems of the Cooperative.
- m) Send false or altered information or data through the information systems of the organisation.
- n) Leave systems and equipment switched on and unattended when not being used, especially if they can be seen by unauthorised people or those outside of the organisation.

#### **4.15.-Protection of brands, industrial and intellectual property.**

4.15.1.- "Consum", as a socially responsible cooperative, is fully and directly committed to the protection of intellectual and industrial property, both its own and external, including, amongst other things, the rights of the author, patents, utility models, trademarks, brand names, domain names, reproduction rights, design rights, data base extraction rights, and rights regarding specialised technical expertise.

4.15.2.- Therefore, the personnel of the Cooperative (partner or not) may not, under any circumstance, and without this prohibition being able to be subject to any kind of exemption, use works, creations, or distinctive signs of intellectual or industrial property of third parties, without having (duly accredited and with documented proof) the corresponding authorisation of its owner (rights and/or licenses)

Thus, no person within the organisation is permitted to:

- a) Reproduce, plagiarise, distribute or publicly communicate, in full or in part, export, import or store literary, artistic, or scientific works, or its transformation, artistic interpretation or execution in any media format, or communicated through any type of medium, without the explicit authorisation of its owner.
- b) Manufacture, import, possess, use, offer, or introduce onto the market objects or procedures covered by industrial property rights without the consent of the owner, including patents and utility models, industrial models or designs and semiconductor topographies.
- c) Reproduce, imitate, modify, import or any other means of seizing an identical distinguishing sign or one mistakeable with another protected by industrial property rights registered in accordance with trademark law without the express consent of the owner.
- d) Use any type of material without proof of the prior authorisation of its owner, in particular, the use of images and texts in advertising, patents, and utility models in the development of the different projects.
- e) Use images, texts, or drawings found on the internet, for which the corresponding rights have not been acquired, unless regarding documents that are free from copyright.

f) Access the Cooperative's website without appropriate authorisation to manipulate or change any piece of information, or enter information or multimedia content (images, videos, etc) that may constitute an infringement of intellectual and industrial property legislation.

4.15.3.- "Consum" has its own brands which are duly registered in the class it considers appropriate for its protection. Therefore, no employee of the cooperative (partner or not) may use them for private purposes or those other than to carry out their role. The infringement of this prohibition may constitute a serious breach susceptible to being sanctioned by expulsion (in the case of partners) or dismissal (in the case of employees).

4.15.4.- The Cooperative's personnel will adopt the necessary measures to protect the intellectual and industrial property, ensuring that the processes and decisions in this area are duly monitored (are documented, justifiable and verifiable, in particular, through the titles of the works, creations or distinctive signs and application of the contractual clauses that guarantees originality and peaceful use of those of third parties)

4.15.5.- The intellectual and industrial property resulting from the work of employees during their tenure at the Cooperative, and which is related to the current and future business of "Consum", will be property of the Cooperative, unless otherwise agreed.

4.15.6.- Only brands, images and texts which are duly authorised by the Department of Partner-Customer and Marketing (when referring to marketing and commercial advertising) or the External Relations Department (when referring to advertising or corporate information) may be used in marketing and publicity. At an internal communication level, logos, brands and texts will be used that are determined by the Personnel Department. In any event, there will be the required coordination in this subject through the Communication Committee.

#### **4.16.- Trading log.**

4.16.1.- All operations with economic transactions carried out by the Cooperative will be labelled with transparency and precision in appropriate accounting records that represent the faithful transactions carried out and will be made available to internal and external auditors.

4.16.2.-“Consum” employees will enter financial information onto the systems of the Cooperative fully, clearly, and accurately, in such a way that they reflect, the corresponding date, their rights and obligations of compliance with the relevant regulations. In addition, they will ensure the rigour and integrity of the financial information that, in agreement with current regulation, must be communicated to the market.

4.16.3.- “Consum”, as a socially responsible company, is committed to having implemented and maintaining a suitable internal control system regarding the processing of financial information, guaranteeing the periodical monitoring of its effectiveness. The accounting records will be made available to internal and external auditors at all times. To guarantee this obligation, the Cooperative is committed to make available to its employees the specialised training to ensure they know, understand and comply with the commitments established by the Cooperative in terms of the internal control of financial information.

4.16.4.- The employees of the Cooperative must undertake the principle of information transparency, understood as the commitment to communicate to partners, the Cooperative itself and to third parties that may have an interest in the affairs, the information, of any nature, and in particular, the economic-financial information and proprietary information about “Consum”, that must faithfully reflect is economic, financial and proprietary information in agreement with the generally accepted principles of accounting.

4.16.5.- The information from the records and reports of "Consum" must always be complete, true and accurate, consequently all transactions in the Cooperative must be reflected with clarity and precision in the files and accounting and, in the same way, they must be maintained in an organised way, suitably developing physical or electronic records to prevent possible destruction or concealment.

4.16.6.-In all cases, it is prohibited to, and must not be carried out under any circumstances: a) Record operations on mediums which are not part of the accounts and not recorded in the established procedures; b) Record inexistent expenses, income, active or passive; c) Stop recording operations carried out or consign them incorrectly; d) Make entries for expenses with incorrect statements; e) Use false documents of any kind; f) Deliberately destroy documents before the time limit established in the current regulations; g) Knowingly give incorrect, inaccurate or vague information, or that may confuse the person receiving it; h) Hide or distort the information on accounting records and reports of the Cooperative; i) Intentionally count the assets or liabilities of the organisation above or below their value.

4.16.7.- "Consum", by agreement through its Meeting Held, will create an Audit Control Committee, in accordance with the contents of the Third Additional Provision of the Law 22/2015, of Accounts Auditing (LAC), in view of its condition of "public interest entity" effective from 2018, which will have its own responsibilities given in said agreement and, in particular, will also collaborate with the Ethics Committee and the Compliance Officer in the implementation and execution of the contents of this Code.

## **5.- Corporate Social Responsibility (CSR): social and environmental commitment.**

5.1.- The cooperative is firmly convinced of the need to apply sustainable policies at all levels of the organisation, in order to guarantee the stability of the people who form part of it, without compromising the opportunities of future generations. In this sense, social responsibility forms an integral part of our DNA, and principles such as solidarity and redistribution of wealth are firmly rooted throughout the management of the cooperative.

5.2.- Accordingly, "Consum" doesn't just publish a financial report, as is legally required, but goes beyond that, publishing yearly since 2006, a Sustainability Report, reflecting all relevant actions carried out every year by the Cooperative. The report is compiled according to the criteria of the "*Global Reporting Initiative*" (GRI) and is duly audited by an accredited external company, with the highest rating possible.

5.3.- As part of this way of being, doing and managing, "Consum" has approved a Sustainability Policy, that reports all Strategic Plans and Management of them, committing to maintaining and updating it according to the changes in the generally accepted criteria. Therefore, all activities carried out by the Cooperative are geared towards satisfying the interests of all stakeholders, with particular relevance to internal social activities (distribution of all economic surpluses with their associates and transparent participation in corporate bodies, and in accordance with democratic standards, as is the case with cooperatives, where the primacy is people over capital, so the rule "one person, one vote" applies), to external social activities (with particular relevance in collaborations with non-governmental organisations and charities which contribute to the improved quality of life for people in need, from which the "profit" programme of the responsible management of foods stands out), and environmental activity (in which "Consum" firmly commits to reducing the carbon footprint).

## **6.- The Ethics Committee and Compliance Officer.**

### **6.1.- The Ethics Committee**

6.1.1.- In order to guarantee compliance with this Code, an Ethics Committee has been created at the heart of the Cooperative, who's composition is as follows:

- Compliance Officer, either an individual person or Compliance Committee.
- Whoever is the Management of the Administration Department.
- Whoever is the Management of the Personnel Department.
- Whoever is the Management of the External Relations Department.
- Whoever is the President of the Social Committee.

6.1.2.- The Ethics Committee can act on their own initiative or at the request of any employee or supplier of "Consum", or a third party with a direct relationship and a legitimate commercial or professional interest, via a complaint raised in good faith.

6.1.3.- For this purpose, communications carried out regarding this Code, when they contain queries relating to its interpretation or application, can be sent to the Cooperative through either of the following means:

- Ordinary mail.- to the registered office of the Cooperative: Avenida Alginet, nº 1, 46460, Silla (Valencia), for the attention of the Ethics Committee.
- Email.- to the following address: [comitedeeticaconsum@consum.es](mailto:comitedeeticaconsum@consum.es).

However, when the communications contain complaints for a breach of the provisions of this Code or any other current regulation, they must be carried out via the Complaints Channel as regulated in section 7 below.

6.1.4.- The Ethics Committee depends organically on the Board of Directors, through the Management and Audit Control Committee, and is assigned the following basic functions:

- a) Monitoring the compliance and internal dissemination of the Code between all personnel of the Cooperative.
- b) Receiving all types of documents relating to the application of this Code and their remission, when applicable, to the body or Department of the Cooperative who must handle and resolve it.
- c) Controlling and supervising the handling of the files and their resolution.
- d) Interpreting and clarifying the doubts arising from the application of this Code.
- e) Proposing to the Governing Council, following the report by the Audit Control Committee, how many clarifications and developmental regulations need this Code to be applied and, as a minimum, an annual report analysing its application.
- f) The supervision of the Complaints Channel and the compliance with the procedure.

6.1.5.- In carrying out its functions, the Ethics Committee guarantees: a) The confidentiality of all information and background information handled, as well as the actions carried out, unless disclosure of information is required by law or legal requirement; b) The thorough analysis of any fact, information or document, based on which it promotes its activity; c) The instruction of a suitable procedure to the circumstance of the case, in which it will always act independently and with total respect to the right to be heard and presumption of innocence of any affected person; d) The indemnity of any whistle-blower as a consequence of presenting requests or complaints to the committee in good faith.

6.1.6.- The Ethics Committee has the necessary means to guarantee the application of this Code.

6.1.7.- The decisions of the Ethics Committee will be binding in nature for the Cooperative and the employees (partners or not) of the Cooperative.

## **6.2.- The Compliance Officer.**

6.2.1. The Cooperative will make available, in accordance with the provisions of section 4.6.7 of the Consum Code of Good Corporate Governance, a duly updated document containing an "Evaluation of Risks of Crime", resulting from a global review process of risks, not just criminal ("360° Risk Map"), that the Cooperative will have permanently implemented and updated.

6.2.2.- This evaluative document, together with the Good Corporate Governance Code and this Code of Ethics and Conduct, as well as the actions derived from its application, constitute the "organisation and management model" to avoid criminal penalties for the company and, fundamentally, also aims to promote a true ethical corporate culture, as an expression of a culture of regulatory compliance.

6.2.3.- The objectives that the Cooperative must comply with regarding criminal law and prevention programmes are:

6.2.3.1.- Crime prevention. - For this purpose, the model of prevention has been designed and implemented and a "Compliance Officer" has been named so that they can supervise its running and compliance, through the monitoring and control of personnel under the model (management of the model), keeping it constantly updated, as well as duly informing all personnel.

6.2.3.2.- The detection of crimes that the model has not been able to avoid. - For this purpose, the "Complaints Channel" has been established, through which necessary internal investigations will be launched to detect the hypothetical infringement and its perpetrator.

6.2.4.- In order to duly control all the specifically criminal risks, the Cooperative will name a "Compliance Officer", who may be one single person or be integrated into a committee for this purpose, who will have the following functions:

6.2.4.1. Confirm and verify the correct design of the "risk map" from which the whole model has been designed. - And to this effect, they will consider the characteristics of the territory in which the Cooperative operates, the type of business (supermarkets) that it carries out and the specific characteristics of their employees (partners or not). This will also involve the requirement to check that the policies defined in the model match the cooperative business values of this Ethical Code, and that the management procedures and controls that are expected to be suitable to develop these policies, as well as prevent the risks as and how they have been evaluated. They must pay particular attention to verifying that the procedures and controls are kept up to date and correctly primed.

6.2.4.2.- Inform and train personnel of the Cooperative regarding the model of prevention. - For this, the Cooperative will make available all necessary means and resources so that all personnel are informed about the compliance programme, them being responsible for ensuring that this information reaches the recipients. The general training must include the running of periodic training sessions (general or by department), that must coordinate, although not necessarily run them. The Compliance Officer must pay particular attention to the significant changes in the management methods of the activity of the Cooperative, to technical and technological changes, to structural changes in the Cooperative, to legal and/or regulatory modifications that affect the Cooperative, as well as the rest of the aspects related to the model of prevention.

6.2.4.3.- Review and propose the modification of the model of prevention- In order to maintain the model in perfect working order, they must be dynamic, so they can prevent future risks or, at the very least, minimise or avoid them. Accordingly, the Model of Prevention must go through the necessary changes that are a result of the changes in conditions that were considered in its initial design, as long as no errors, infringements or criminal behaviours are detected which highlight their weaknesses.

6.2.4.4.- Manage the Complaints Channel and the internal investigations. - They will coordinate the working of this complaints channel, in accordance with **Annex II** included with this Code so that the Compliance Officer may detect the criminal behaviour not just through this channel, but also ex officio or by express mandate from the General Management of the Governing Council.

## 7.- The Complaints Channel.

### 7.1.- Concept and general considerations.

7.1.1.- **Concept.-** The Complaints Channel is an internal mechanism managed exclusively by the Personnel Department and the Ethics Committee, whose aim is to facilitate transparency within the cooperative so that it serves as a tool to detect irregularities that may put both "Consum" and its employees (partners or not) at risk, and allows all employees (regardless of their job role, function, or hierarchical rank), suppliers, partner-customers and customers, to communicate irregular situations that they may become aware of, related to the infringement of a legal regulation, an internal regulation, or this Code. This communication will always be suitably documented and with the evidence available, under the strictest confidentiality, but anonymous communication is never acceptable.

7.1.2.- **Right and Duty to Report.-** All personnel of the Cooperative (partner or employee) and, in particular, for their higher level of responsibility, the Managers, Executives, Area Managers and other managers of the Cooperative, may and must bring to light any irregular behaviour or conduct, or that contravenes current law, internal regulations, or the provisions of this Code, and especially, any action or omission which may cover up the nature of the crime. The complaint will be communicated exclusively through electronic means, completing the relevant form which can be found in the "Complaints Channel" section of the Consum website. **Annex II** of this Code (Usage Policies of the Complaints Channel) provides a guide of how to make a complaint.

**7.1.3.- Consequences of the complaint.-** All those who, in good faith, notify the events of which they have become aware or been a participant in, through this Channel, will be protected against any reprisal, discrimination, or penalisation, as a result of or on the grounds of the complaints they may file. Accordingly, "Consum" ensures (providing all the measures necessary) the maximum confidentiality regarding the identity of the person filing the complaint. However, any complaint made in bad faith will involve the notifier assuming the legal responsibilities for the damage this complaint may cause to the rights of the people unfairly accused or in bad faith. It is therefore, a general principle that applies to this Complaints Channel, the fact that all those who submit complaints to it, do so in good faith, without pursuing spurious interests and with the only purpose of protecting the reputation and heritage of the Cooperative.

## **7.2.- Handling of information obtained through the Complaints Channel.**

7.2.1.- All of the information of a personal nature provided in the subject of the complaint will be treated according to the current regulations regarding data protection (at the time of the approval of this Code, the Organic Law 15/1999, of 13<sup>th</sup> December, on the Protection of Information of a Personal Nature, and subsequently, from the 25<sup>th</sup> May 2018, the European Protection Regulation – (EU) Regulation 2016/679, of the European Parliament and Council, of 27<sup>th</sup> April 2016-). Thus, its handling will be done with legitimate purpose and specifically in relation to the investigation that may arise as a result of the complaint, for which they cannot be used, under any circumstance, for incompatible purposes, and must be suitable and not excessive in relation to the aforementioned purposes. In this respect, in accordance with the Legal Report 127/2007, of the Spanish Data Protection Agency, complaints will be dealt with, as aforementioned, in a strictly confidential manner, but those that are made anonymously will not be accepted (nor will they be proceeded with), as a demonstration of the right to defence of whoever is accused.

Thus, any person who has been the subject of a complaint through this channel, will be duly informed of said circumstance, of the incident they have been accused of, of the Departments and third parties that may be affected and the possible recipients of the information that is provided (understanding this to mean Courts or Prosecutors, in the case of suspicion or reasonable indications of a crime being committed). Equally, the accused will be informed regarding the paperwork that will form part of the file that, where appropriate, will be opened, as well as the way in which they may exercise their rights of access, rectification, cancellation or opposition, in accordance with the regulations regarding the protection of information of a personal nature.

### **7.3.- Operation of the Complaints Channel.**

7.3.1.- The course of action, the procedure and other issues relating to this Channel, can be found detailed in the Document of Usage Policies of the Complaints Channel, which is attached to this Code as **Annex II**.

## **8.- The approval, modification, compliance and interpretation of the Code.**

8.1.- The Governing Council will be exclusively responsible for the approval and modification of this Code, with the agreement of at least two thirds of the members being necessary to do this.

8.2.- With the approval of this Consum Code of Ethics and Conduct, the entity firmly undertakes the ethical commitment of complying with it, and in the case of not being able to, to duly explain its exceptions or the reasons for which it was unable to comply.

8.3.- The serious breach by any employee (partner or not, and regardless of their hierarchical rank, without exception) of any of the obligations or guidelines established in this Code (regardless of whether the sanction is specifically stated or not in the sections of the Code), may be considered as a serious breach, for the infringement of contractual good faith, being susceptible to being sanctioned by expulsion from the Cooperative (in the case of working partners) or with dismissal (in the case of employees).

8.4.- This Code will be interpreted in accordance with current Spanish laws.

## **9.- The dissemination and application of the Code.**

9.1.- All employees of the Cooperative (partners and salaried employees) are obliged to know and apply this Code, in particular, members of the Governing Council, who will demand that the General Management and Department Managers ensure its application, dissemination, compliance, and execution.

9.2.- Equally, the provisions of this Code will be provided to all suppliers of goods or services who work, or are going to work, with the Cooperative, incorporating the Supplier Clause to corresponding contracts, wherever possible.

9.3.- The Code will be provided to all employees of the Cooperative and will remain published on the intranet of the Cooperative (with access for working partners and employees) and will be subject of suitable communication activities, training and awareness for its timely understanding and implementation throughout the organisation.

**DILIGENCE OF APPROVAL.** - This Code of Ethics and Conduct was approved by unanimous agreement by the "CONSUM, S.COOP.V." in the meeting held on 25<sup>th</sup> January 2018. By means of an agreement of the Governing Council dated October 25, 2018, the nomenclature of the Audit Committee was adapted.

## **ANNEX I.-** **(SUPPLIER/CREDITOR CLAUSE)**

### **Clause model for contracts with suppliers/creditors (code of ethics and complaints channel).-**

**XX.- CODE OF ETHICS AND COMPLAINTS CHANNEL.-** It is confirmed that CONSUM has implemented a Code of Ethics and Conduct, which is available to its suppliers, creditors, and interested third parties on the Corporate web page. Accordingly, the contracting parties accept that any poor management by the Supplier may be detrimental to CONSUM, both with regard to potential harm caused to customers, as well as possible detriment to its good image and reputation.

For this purpose, the parties agree that the Supplier/Creditor:

- 1) Will act with integrity, responsibility and diligence.
- 2) Will maintain suitable risk management systems to organise and control their activity in a responsible and effective manner.
- 3) Will maintain the necessary financial resources to carry out their activity.
- 4) Will follow the correct codes of conduct in the market.
- 5) Will pay due attention to the interests of CONSUM customers who they must deal with as a result of the contracted activity.
- 6) Will provide information needed by CONSUM customers in a clear, accurate and non-misleading manner.
- 7) Will manage conflicts of interest that may arise in a suitable and fair manner.
- 8) Will deal with customer complaints adequately and fairly, using their opinions and lessons learned to avoid future reoccurrences.
- 9) Will treat their employees with dignity and respect, without allowing them to be subjected to physical punishment, any type of bullying, or abuse of power.

10) Will avoid all forms of child labour, any type of forced or compulsory labour, discrimination in any job position, and will respect the established maximum working hours and minimum wages.

11) Will guarantee that their employees will carry out their work under the safety and hygiene standards.

12) Will respect employee's rights to associate, organise themselves or negotiate collectively without suffering any kind of sanction for doing so.

13) Will obtain and maintain environmental permits needed for their activity, and in the event that their operations generate waste, will supervise, control and treat it in accordance with the relevant legislation.

14) Will avoid being a participant in any kind of corruption, extortion, or bribery, and will apply internal policies to avoid actions that may be considered as acts of bribery and/or corruption.

15) Will check that companies they subcontract work under the standards promoted in this document and within the relevant legal framework.

16) Will apply in their activity the regulations relative to competition law.

On the other hand, the Supplier/Creditor is made aware that, within the CONSUM internal process which establish Good Governance procedure, a Complaints Channel has been implemented, with the aim that employees, customers, third parties and suppliers/creditors of CONSUM, may bring to light the possible perpetration of criminal activities within the organisation or any conduct or irregularity related to the infringement of a legal or internal regulation, or of the CONSUM Code of Ethics and Conduct.

Accordingly, the Supplier/Creditor may make complaints by completing the relevant form which can be found in the "Complaints Channel" section on the CONSUM website.

It is acknowledged that all those who, in good faith, notify the aforementioned irregularities, will be protected against any type of reprisal, discrimination or penalisation as a result of the complaints they may make.

CONSUM guarantees maximum confidentiality in this regard and abides by current regulations with regard to data protection in the handling of information of a personal nature supplied with the complaint or obtained in the course of the complaint process.

## **ANNEX II.- COMPLAINTS CHANNEL.-**

### **CONSUM, S.COOP.V. Complaints Channel Questionnaire.**

#### **1.- Background.-**

With the aim of complying with the regulations contained within the CONSUM, S.COOP.V. Code of Ethics and Conduct (hereafter CONSUM or the Cooperative), the general obligation is established, which is applicable to all employees and management of the Cooperative, to report any infringement detected within the Cooperative, relating to conduct that goes against the current legislation, that implies a violation of the regulations of the Code of Ethics and Conduct or that may imply a violation of internal policies, rules, or procedures, ensuring utmost respect by all members of CONSUM for the law and the ethical standards of the Cooperative.

All those employees and Managers of CONSUM who identify a breach of the regulations established by law or by internal regulations, must notify this through the Complaints Channel, which is put together as a confidential tool and whose use will not bring reprisals, as long as the complaint is done in good faith.

Likewise, this Complaints Channel is available for all customers, suppliers and third parties with whom CONSUM has a relationship.

To this effect, CONSUM provides all its employees and aforementioned third parties with a Complaints Channel, available on the Cooperative's website, in the "Complaints Channel" section.

"Employees" or "managers" will be understood to mean both salaried employees as well as working partners of the cooperative, to whom all of the obligations of this document will apply.

## 2.- Complaints Channel Questionnaire.-

The complaints made through this line of communication will be communicated only and exclusively through electronic means, by completing a questionnaire which will gather the following elements:

- Identification of the whistle-blower: full name, contact method, either through email or telephone.
- Relationship with CONSUM: employee, customer, supplier or other type of relationship.
- Identity of the person who is the subject of the complaint: full name (if known), as well as other information they are aware of that they consider relevant to the identification of the alleged offender.
- Reason for the complaint: description of the facts or circumstances that, in the opinion of the whistle-blower, constitute an infringement or irregularity.
- Concrete evidence in support of the complaint: all documents they have available, that support the believe that the irregularity described in the reason for complaint has been committed.

## **CONSUM, S.COOP.V Action Protocol**

### **1.- INTRODUCTION.-**

The Complaints Channel of CONSUM, S.COOP. V. (hereafter CONSUM or the Cooperative) constitutes a tool available to all CONSUM employees (whether they are working partners or not), as well as suppliers, customers, or third parties with whom the Cooperative has a relationship, for the communication of irregular or improper conduct committed within the Cooperative.

All CONSUM employees, as soon as they become aware of the alleged irregularity, are obliged to report any detected breach within the Cooperative that may contravene the current legal regulations, which is contrary to the CONSUM Code of Ethics and Conduct or infringes the internal policies, regulations or procedures.

For their part, those customers, suppliers, or third parties who are aware of any breach in the same sense, have the option of using this channel to communicate it.

This document aims to determine those aspects which may be considered in the complaint handling process and investigation of the reported facts.

### **2.- RECEIPT OF THE COMPLAINT.-**

Once the complaint has been communicated through the Complaints Channel made available by CONSUM, the person responsible for the Management of the Complaints Channel will receive notification of said complaint and will automatically assign it an identification code.

The system will be contained within a secure database with restricted access which will record all complaints received, the date of receipt, the identification code, the actions carried out and the measures adopted.

### **3.- ADMISSION OR REJECTION OF THE COMPLAINT TO THE PROCESS.-**

Once the complaint has been recorded, the person in charge of the Management of the Complaints Channel must analyse and evaluate said complaint, in order to accept or reject it for processing. In this sense, the person responsible for the Management of the Complaints Channel will accept for processing those complaints which are expressed clearly and show clear facts constituting an infringement, irregularity or breach of the current legal regulation, the commitments contained within the Code of Ethics and Conduct or of the CONSUM policies, regulations and procedures.

In both circumstances, whether a complaint has been accepted or rejected, it will be the responsibility of the person responsible for the Management of the Complaints Channel to **communicate to the whistle-blower** this fact, through the tool. In the event that the complaint is rejected, the whistle-blower may consider redrafting the complaint or use other legal channels they consider to be appropriate.

The decision to accept for processing or not, must be recorded on the complaints management system and communicated, within the time frames outlined below, to the Ethics Committee (supervising body of the Complaints Channel).

In the event of being accepted for processing, the person responsible for the Management of the Complaints Channel must determine: a) if the complaint **must be handled urgently**, in which case it will be communicated immediately to the Ethics Committee (so that this body can be aware of the complaint as soon as possible); b) or if, on the other hand, it must be **analysed as normal**, in which case it will be classified and all necessary supporting information will be collected and sent to the Ethics Committee to deal with at their next ordinary meeting.

In the event that the complaint is directed against a member of the Ethics Committee, or in the event of there being any circumstance that may generate a possible **conflict of interest** of one of them, this person will be excluded from the decision to accept or reject the complaint as well as everything regarding the investigation process, evaluation and resolution of the complaint.

Likewise, the person responsible for the Management of the Complaints Channel, has the duty to maintain strict **confidentiality** in relation to any complaint it received, whether or not it is dismissed, in terms of the whistle-blower and the accused.

#### **4.- PROCESSING THE FILE.-**

Once the complaint is received by the Ethics Committee (when clarified as to whether it is urgent or ordinary), it will decide and communicate to the person responsible for the Management of the Complaints Channel the opening of a file, or the dismissal of the complaint. If the decision is to open a file, the person responsible for the Management of the Complaints Channel will assign a person responsible for processing the complaint (Complaint Handler).

##### 4.1.1.- Start up process.-

Once the notification to set up a file has been received, the Complaint Handler will proceed to completing the following activities:

- Draw up a list of individuals who will take part in the investigation of the complaint, which will depend on the nature of the subject to be investigated.
- Request and guarantee that all members who participate in the investigation process sign, before beginning their work, the relevant confidentiality agreements.
- Open a restricted repository, in which to store information and documentation relating to the investigation.

- Ensure that the handling of personal information is done in accordance with the security measures, for high level personal information, demanded by the Spanish Data Protection Agency.

#### 4.1.2.- Instruction Process.-

The Complaint Handler will be responsible for the **instruction process**, this is, the investigation process, carrying out all actions and enquiries they consider necessary towards finding out the accuracy and truthfulness of the information received, as well as to clarify the facts.

Such actions and enquiries will include, when considered necessary, meetings and interviews with the people deemed appropriate, recording minutes at the end of the meeting in order to be able to track the process.

During this time, the accused will be informed of the existence of the complaint and the ongoing investigation process, except in cases where such communication may pose a clear and significant risk to the investigation, in which case the communication must be delayed until such danger disappears. Likewise, the accused will be informed of the handling of their personal information so that they can proceed as they see fit.

Once the accused is aware of the complaint and the investigation process, and without prejudice to the possibility of presenting written allegations, the accused person may be interviewed by the Complaint Handler, always with total respect to their presumed innocence, inviting them to explain their version of the facts, and provide all means of evidence they consider appropriate and relevant. Minutes will be taken of the interview.

During the entire process, strict confidentiality will be maintained.

The Complaint Handler and the person responsible for the Management of the Complaints Channel are responsible for storing each piece of evidence that support the investigation and the corresponding actions carried out, for all complaints which have been investigated, and always in accordance with the current legislation regarding Data Protection.

## 5.- ISSUANCE OF THE REPORT.-

Once the complaint proceedings have concluded, the Complaint Handler will proceed to the **issuance of a report of everything that has been carried out during the investigation**, which will be forwarded to the person responsible for the Management of the Complaints Channel and this person, in turn, will send it to the Ethics Committee.

This report will contain, as a minimum:

- A statement of the facts of the complaint together with the identification code of the complaint and the date of its receipt.
- The classification of the complaint for the purpose of understanding the priority or otherwise in its treatment.
- A description of the investigation procedures carried out, as well as the results of them.
- The conclusions of the investigation, with the identification of the weakness that may have caused the situation.
- Proposed action plan to combat the identified weakness.

Once the report has been published and issued to the Ethics Committee, they will be responsible for taking the appropriate internal measures, without prejudice to the responsibilities of any other nature that may correspond to Judges and the Courts.

When the case is resolved and once the course of action has been decided by the Ethics Committee, the person responsible for the Management of the Complaints Channel or the Complaint Handler will notify all involved parties of the decision, as well as the measures that the Ethics Committee has identified.

## **6.- MANAGEMENT AND FILING OF INFORMATION.-**

All information collected during the investigation (including personal data), both that which has been provided by the claimant and that collected from other sources, will be included in the data file owned by CONSUM, maintained under its responsibility and protected by the suitable security measures, the purpose of the file being to deal with and manage communications received through the Complaint Channel.

Additionally, in the event that the request contained in the complaint is rejected, the person responsible for the management of the Complaint Channel, who has access of said tool in CONSUM, will delete this personal information within 60 calendar days.

However, in the event that, even though it has been closed, it is foreseen or may be foreseen that legal action may be taken or a dispute may occur, the information will be retained, as necessary so that the company can exercise their rights in court or outside of it.

## **7.- MONITORING AND CONTROL.-**

In order to maintain the efficiency of the Complaints Channel, the person responsible for the Management of the Complaints Channel will, periodically, provide the Ethics Committee with a summary of the complaints received, whether they have been the subject of an investigation or not.

Additionally, the person responsible for the Management of the Complaints Channel will notify the person responsible for Crime Prevention of aspects to improve and upgrade the design and efficiency of the Model of Crime Prevention in relation to the complaints received.

## **Tasks Manual of the Managing Bodies of the CONSUM, S.COOP.V. Complaints Channel.**

### **ROLES AND RESPONSIBILITIES OF THE MANAGING BODIES OF THE COMPLAINTS CHANNEL.**

The supervision of the working and compliance of the Complaints Channel corresponds to the CONSUM **Ethics Committee**. This body is equipped, by its nature and hierarchical dependence in the organisation, with the sufficient authority, independence, and autonomy to carry out its roles and its working is regulated by the CONSUM Code of Ethics and Conduct.

The roles and responsibilities are distributed as follows:

#### **Roles and Responsibilities of the Ethics Committee in relation to the Complaints Channel:**

- Decision regarding the measures to adopt in the complaints presented to the body: initiate investigations in accordance with the complaints, as well as the means to implement the measures.
- Establishing precautionary measures and, in accordance with the conclusions of the investigation, decide on the measures to be adopted, provided it does not require disciplinary proceedings in accordance with the content of the Articles of Association and the Internal Regulations Procedure for Working Partners, given that in processing the file, it will be the organ in charge of its handling who will continue the investigation initiated through the Complaints Channel. When sanctions proceedings are not opened, the Ethics Committee will determine these measures.
- Approve procedures to manage the Complaints Channel.

- Name the **Person responsible for the Management of the Complaints Channel**.

### **Functions and Responsibilities of the Person responsible for the Management of the Complaints Channel:**

- Management of the Complaints Channel, receipt of complaints, classification and processing.
- Admission to the complaints process: elevating those that constitute a crime or infringement of statutory regulations, or internal regulations, as well as the Code of Ethics and Conduct to the collegial body.
- Designation of the person responsible for processing the complaint (Complaint Handler).
- Design and document the necessary procedures for the administration and management of the Complaints Channel.
- Coordinate and manage the decisions made by the **Ethics Committee** in relation to the measures to adopt, reporting the conclusions and monitoring of the measures.
- Notify the person responsible for Crime Prevention of the possible aspects for improvement and updating the design and effectiveness of the Model of Crime Prevention in relation to the complaints received.

### **Roles and Responsibilities of the Complaint Handler:**

- To handle the complaint, being deemed as such, carrying out all actions which may derive from it, including directing the investigation as investigator of the proceedings.
- Propose to the person responsible for the Complaints Channel, the corresponding decision for each case investigated. This proposal will be mandatory but not binding.