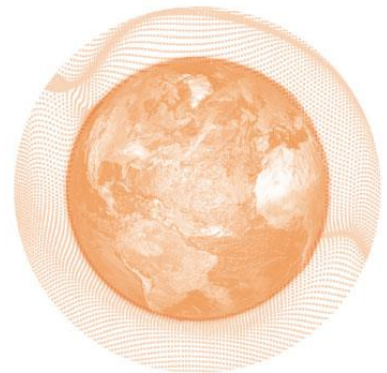




CODE OF CONDUCT LKS NEXT GROUP

ARRASATE-MONDRAGON (GIPUZKOA)

2 October 2020



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Review No.	Date	Review
01	28.11.2017	Approval by the Governing Board
02	02.10.2020	Modification and approval by the Governing Board

1. INTRODUCTION AND SCOPE OF APPLICATION

■ 1.1.- Purpose and General Principle

1.- **LKS NEXT GROUP** aims to ensure that its conduct and that of the People who are part of it complies with current legislation and the Values and Ethical Principles set out in this Code of Conduct.

2.- LKS NEXT GROUP declares its commitment and links to Human Rights as well as to labour, environmental and anti-corruption standards and, in particular, to the principles on which the United Nations Global Compact is based to promote Corporate Social Responsibility (CSR).

3.- This Code of Conduct is part of the LKS NEXT GROUP's Compliance Program and is aimed at:

- a) Establishing the Values and Ethical Principles as well as the guidelines or rules of conduct of the LKS NEXT GROUP that serve as a guide for the actions of the People within the professional activity in LKS NEXT GROUP and in our relations with the rest of the People in the LKS NEXT GROUP, as well as with Suppliers, Associates, Clients, Public Administrations and society in general.
- b) Ensuring compliance with all regulations applicable to the LKS NEXT GROUP and the people who are part of it, whether commercial, labour, tax, administrative or of any other nature and, in any case, preventing criminal behaviour and any unlawful behaviour by People while performing their professional activity.

4.- The Code of Conduct also aims to consolidate a corporate culture that already exists at LKS NEXT. The Code of Conduct reflects LKS NEXT GROUP's commitment to its Values and Ethical Principles in all its actions for the performance of its Activity.

5.- LKS NEXT GROUP does not tolerate any act contrary to this Code of Conduct. The real and effective application of the Values and Ethical Principles set out in this Code of Conduct will be ensured, and non-compliances will be managed by the Compliance Committee through the Ethics Channel.

■ 1.2.- Scope of Application and Duty of Compliance

1.- The Values and Ethical Principles and the Rules of Conduct contained in the Code of Conduct, as well as in the Compliance Program as a whole, are mandatory for all the people who make up the LKS NEXT GROUP.

2.- The people who make up the LKS NEXT GROUP are obliged to know and comply with the contents of this Code of Conduct.

3.- The Code of Conduct is applicable to the Controlled Companies and, as far as possible, to the rest of the LKS NEXT GROUP's investee companies.

4.- The Code of Conduct will be extended, as far as possible, to Suppliers, Associated Persons and Clients of the LKS NEXT GROUP.

5.- The Code of Conduct will apply, as far as possible, to the activities carried out by the LKS NEXT GROUP in any geographical area, both locally and internationally.

6.- All the people who make up the LKS NEXT GROUP are informed of the Code of Conduct through the Welcome Plan. The Plan indicates the obligation to comply with the Code of Conduct.


2. GENERAL RULES OF CONDUCT

■ 2.1.- Professional Conduct with Integrity

1.- The conduct of the People in the LKS NEXT GROUP is based on professionalism and integrity.

a) Professionalism is acting diligently, responsibly, prudently and efficiently. In this sense, relationships between the LKS NEXT GROUP's People and the interested parties are based on professional behaviour, which is materialised in the following actions:

- We comply with laws, regulations and professional standards and seek to avoid any action that could discredit the profession.
- We foster a culture of appropriate professional rigour and personal responsibility, which supports the client and promotes the quality of the services provided by the LKS NEXT GROUP.
- We understand the broad impact that our work has on society, people and clients, and their interest is taken into account in the provision of our different services.
- Our services are focused on the client's real needs, in order to provide an effective response and add value.

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- We are committed to the client and to results, building relationships as trusted, long-term partners, sharing objectives for mutual benefit.
 - We act on personal and professional development to expand the capacity to contribute and to promote it in their environment.
 - We pay attention to efficiency and profitability in the development of the activity, integrated within the contribution of value to the client and people's satisfaction, for the sustainability and reinforcement of the project.
 - We transmit knowledge and confidence in the LKS NEXT project in our relations with the different stakeholders.
 - Likewise, the people of the LKS NEXT GROUP rely on our professional competence in all activities, for which:
 - ✓ We take due care to assign to each client, according to their needs, the people who have the necessary competence and knowledge for their work.
 - ✓ We encourage innovation and new ideas to improve the value and performance of services and products.
 - ✓ We understand that both staff and clients expect our work to be of the highest professional standards.
- b) Integrity is acting loyally, honestly and in good faith, with respect for oneself and for others in the exercise of one's professional activity, in accordance with the trust placed in the Person.
- In this sense, the people in the LKS NEXT GROUP act with sincerity and honesty with regard to our professional opinions and business relationships.
 - We are honest about the services we provide, the knowledge we have and the experience we have acquired.
 - Likewise, the LKS NEXT GROUP is made up of people who are responsible for the commitments they have made and we maintain an open attitude of collaboration and trust.

2.- The people in the LKS NEXT Group apply to ourselves and to others the Values established in the LKS NEXT GROUP's culture and the Ethical Principles of this Code of Conduct, and we do not exercise our professional activity for purposes other than those for which we have been commissioned.

■ 2.2.- Excellent Management

The People in the LKS NEXT GROUP base all their activities on excellent management of the service provided:

- We provide a quality service, combining expertise and scope of resources, experience and knowledge to help clients address their needs and problems.
- The conditions of the service, such as scope, action plan, deadlines, etc. are agreed in advance with the client.
- We deliver results that have a relevant impact for clients and other stakeholders.
- We apply the best innovation techniques to meet objectives and generate value in solutions.

■ 2.3.- Respect for the Law as well as the Internal Rules and Contracts Binding the LKS NEXT GROUP

1.- We carry out our professional activities in compliance with current legislation as well as with the internal rules and contracts that bind the Company, in all the territories where the LKS NEXT GROUP operates.

2.- We must comply with this Code of Conduct and the Controls that make up the LKS NEXT GROUP Compliance Programme.

3.- We must respect the obligations and commitments made by the LKS NEXT GROUP in its contractual relations with third parties, as well as the uses and good practices of the countries in which it carries out its professional activity.

4.- Lack of knowledge of the legislation, the Code of Conduct, the Controls or the contracts binding the LKS NEXT GROUP, as well as the argument that it is a generalised infringement within the LKS NEXT GROUP, will not justify non-compliance.

5.- Any indications or orders contrary to the law, the Code of Conduct, the Controls or the contracts binding the LKS NEXT GROUP that may be received during the professional activity do not release the Persons acting in accordance with such indications or orders of any liability.

6.- The executives and those who manage or lead teams of People will:

- a) Be knowledgeable about legislation, the Code of Conduct, Controls and contracts affecting their respective areas of activity.
- b) Be a benchmark for conduct in the LKS NEXT GROUP.
- c) Safeguard and ensure that the Persons reporting to them receive adequate information and training to enable them to know and comply with the legislation, the Code of Conduct, the Controls and the contracts linked to the LKS NEXT GROUP that affect them.

■ 2.4.- Objectivity

The people in the LKS NEXT GROUP hold the principle of objectivity as the basis of all our professional activities, to this end:

- We are objective when it comes to giving a professional opinion and advice.
- We do not tolerate bias or inappropriate influences from others to avoid responsibility or professional judgement.
- In our relations with clients, suppliers and colleagues, we are open to listening to and understanding different points of view. We accept differences of opinion and judgement, and value them constructively and professionally.
- We recognise our own mistakes, limitations and potential, using self-criticism and acceptance of opinions as levers for learning and improvement.

■ 2.5.- Conflicts of Interest

1.- The People in the LKS NEXT GROUP must avoid any situation of Conflict of Interest.

2.- A Conflict of Interest is deemed to exist in those situations in which the personal interest of any Person in the LKS NEXT GROUP and the interest of the Company itself clash or are influenced or distorted. A personal interest exists when the matter directly affects the Person or another person related to the Person.

3.- Persons related to the Person are considered to be the Person's spouse or person in a similar relationship; the ascendants, descendants and siblings of the Person or of their spouse (or person in a similar relationship); as well as companies or enterprises in which the Person or persons related to the Person are in a position of control or hold an administrative or management position, or, directly or indirectly, have a significant influence on the financial and operating decisions of such companies or enterprises.

4.- The Person who is faced with a Conflict of Interest will inform his or her immediate supervisor of the Conflict of Interest in which he or she is involved as soon as possible. In case of doubt as to whether a Conflict of Interest exists, it will be submitted to the interpretation of the Regulatory Compliance Committee. Likewise, the Person affected by the Conflict of Interest will refrain from intervening in or influencing the decision making affected by the Conflict of Interest, from participating in meetings where such decisions are made and from accessing Confidential Information affecting the Conflict of Interest.

■ 2.6.- Promoting the Image and Reputation of the LKS NEXT GROUP

1.- The LKS NEXT GROUP has a solid reputation thanks to its extensive experience and a solvent and loyal technical team, committed to the Values and Ethical Principles and know-how that make up the culture of the LKS NEXT GROUP.

2.- We must take the utmost care to preserve the LKS NEXT GROUP's image and reputation in all our professional activities. We will also monitor the respect and correct and appropriate use of the corporate image and reputation by Suppliers, Associated Persons and Clients.

3. PEOPLE

■ 3.1.- Respect for People

1.- At all professional levels, we promote relationships based on mutual respect, integrity, cordiality, trust, collaboration and teamwork, fostering a respectful working environment among colleagues, hierarchical superiors and people in charge, in order to achieve a positive working environment.

2.- Lack of respect and consideration, offence, defamation, intimidation, abuse, harassment or any kind of psychological, physical or sexual aggression are unacceptable and will not be permitted or tolerated at work.

■ 3.2.- Prohibition of Child Labour and Protection of Minors

The protection of minors is one of LKS NEXT GROUP's Ethical Principles, which implies not resorting to child labour, understood as work that deprives children of their childhood, their potential and their dignity, and that is detrimental to their physical and psychological development.

■ 3.3.- Protection of Foreign Nationals

The LKS NEXT GROUP assumes the protection of foreign nationals by complying with the relevant immigration regulations.

■ 3.4.- Equal Opportunities and Non-Discrimination

1.- The LKS NEXT GROUP is fully committed to the principle of equal treatment, rejecting all forms of discrimination and recognising the right to work under equal opportunities. Likewise, the LKS NEXT GROUP will not tolerate physical, sexual, psychological or verbal harassment or abuse, or any other form of degrading treatment.

2.- Another of the LKS NEXT GROUP's Ethical Principles is to provide equal opportunities in access to employment and professional promotion, ensuring at all times the absence of discrimination on grounds of sex, race, sexual orientation, age, disability, illness, religion or any other circumstance that could be a source of discrimination.

3.- The LKS NEXT GROUP promotes work-life balance through policies and measures that help to combine personal and family objectives with professional objectives.

4.- In both internal and external relations, we use inclusive language that makes it clear that we are a collective in which both women and men work and that we address the whole of society.

5.- As a result, all People, at all professional levels, promote relationships based on mutual respect, integrity, cordiality, trust, collaboration and teamwork, fostering a respectful working environment, in order to achieve a positive working environment.

■ 3.5.- Ethical Recruitment

The People in the LKS NEXT GROUP involved in recruitment, selection and/or professional promotion processes are guided by objectivity in their actions and decisions, with the aim of identifying those people who present a profile that is most in line with the profile and needs of the post to be filled, promoting equal opportunities.

■ 3.6.- Intercooperation and Teamwork

Relations in the LKS NEXT GROUP are based on the values of inter-cooperation and teamwork, and to this end:

- We work as a team, sharing resources, activities, results, successes and failures, contributing knowledge and skills for the common good, being aware of the team's needs and contribution to the team.
- We participate actively and democratically in the development of the project, both in socio-labour and client-oriented activities.
- We contribute and cooperate from different teams, promoting mutual knowledge, synergies, integration and the strengthening of the common project.
- We act in an honest and co-responsible way, bringing problems and conflicts to the surface, expressing feelings and thoughts openly and engaging in the resolution.
- There is a working context based on trust, respect, support and mutual demands.
- We value and recognise the achievements, efforts and behaviours of individuals and teams.

■ 3.7.- Talent Management

1.- The LKS NEXT GROUP has a Talent Management model that provides a structure and a reference framework for people's professional development. The talent management model is a transparent tool (simple, understandable, known, understood and shared) at the service of all the People in the LKS NEXT GROUP, which proposes person-organisation co-responsibility, in the development of professional careers.

2.- One of the main processes of the Talent Management model is conversations for development. This is a meeting between the employee and their manager, where the employee's professional development is discussed and future action plans are established.

4. HEALTH AND SAFETY AT WORK

1.- Achieving a comfortable and safe working environment for People is one of LKS NEXT GROUP's priority goals for the permanent improvement of working conditions. The LKS NEXT GROUP carries out the relevant actions in the field of occupational risks with a focus on preventive and continuous improvement.

2.- LKS NEXT GROUP provides People with safe, clean and healthy workplaces and work processes.

3.- The People are provided with the necessary means to carry out their professional activity with the appropriate safety and hygiene measures, so as not to endanger the life, health or physical integrity of the People.

4.- We respect at all times the preventive measures applicable to occupational health and safety, using the resources established by the LKS NEXT GROUP and ensuring that the members of its teams carry out their activities in safe conditions.

5.- The LKS NEXT GROUP ensures compliance with the health and safety regulations of the People who work or travel to clients and of all the people who visit its centres.

5. INFORMATION MANAGEMENT

■ 5.1.- Protection of Privacy. Use of Personal Data.

1.- The LKS NEXT GROUP respects People's right to privacy, in all forms, as well as People's personal communications over the Internet and other media. In particular, privacy and personal data rights are respected.

2.- As a result, the LKS NEXT GROUP undertakes to protect all information relating to its People and any affected third parties, and not to disclose personal data except with the consent of the interested parties and in cases of legal obligation or in compliance with judicial or administrative resolutions. Under no circumstances may personal data be processed for purposes other than those legally or contractually provided for.

■ 5.2.- Responsible Use of LKS NEXT GROUP's Assets and Resources

1.- The LKS NEXT GROUP places at the disposal of the People the assets and resources necessary to perform their professional activity, such as means of communication, including telematic means, computer systems and equipment, technological resources, facilities and financial resources of the LKS NEXT GROUP.

2.- We must protect and preserve the LKS NEXT GROUP's assets and resources from any loss, damage, theft or improper use that could be detrimental to the interests of the LKS NEXT GROUP.

3.- We must make responsible use of the LKS NEXT GROUP's assets and resources, in accordance with the guidelines in any rules and instructions of the LKS NEXT GROUP, so that we can carry out our professional activity in an efficient manner, making the most of the time, assets and resources that the LKS NEXT GROUP places at our disposal.

■ 5.3.- Protection of IT Security and Intellectual and Industrial Property Rights

1.- The wrongful or imprudent use of assets and resources entails a serious risk for the LKS NEXT GROUP and the People who are part of it. As a result, the LKS NEXT GROUP endeavours to protect IT security and prohibits the use of unauthorised software and the downloading, installation and use on the LKS NEXT GROUP's computer equipment of malicious software, or any other type of software or computer applications which are not covered by the corresponding official licence for use or which entail the risk of introducing any dangerous element to the security of the computer systems of the LKS NEXT GROUP or of third parties.

2.- The People who make up the LKS NEXT GROUP must respect the Company's intellectual and industrial property rights and trade secrets in relation to projects, processes, technology, know-how and, in general, any content created or developed in the organisation.

3.- The intellectual property, industrial property and trade secrets exploitation rights generated by the People during the performance of their professional activity in the LKS NEXT GROUP are owned by the latter.

4.- Intellectual property rights and industrial property rights as well as business secrets held by third parties outside the LKS NEXT GROUP will also be respected. As a result, we must strive to protect information subject to intellectual and industrial property rights and trade secrets, in each case obtaining licences or authorisations from the legitimate holders of such rights.

■ 5.4.- Treatment and Protection of Confidential Information.

1.- The LKS NEXT GROUP considers information and knowledge to be one of its main and essential assets for business management, which is why they are subject to special protection.

2.- Information of a non-public nature held by the LKS NEXT GROUP, whether on computer medium or any other media, will be considered, in general, as Confidential Information.

3.- We must use the Confidential Information with the utmost caution and we will use sufficient means to protect it, without its content being disclosed to third parties, except with the express authorisation of the responsible Person or area of the LKS NEXT GROUP in each case or unless there is a legal or judicial requirement. To this end, we must be aware of and comply with all the internal rules on the use of information and confidentiality that exist within the LKS NEXT GROUP.

4.- Information will be gathered from Third Parties in a lawful manner. We reject information obtained improperly or infringing the confidentiality under which it is maintained by its legitimate owners.

5.- When the Confidential Information belongs to third parties outside the LKS NEXT GROUP, we must comply with the confidentiality agreements that the LKS NEXT GROUP has signed with such third parties.

6.- In order to achieve these aims, we promote security through awareness and a culture of prevention among all the People in the LKS NEXT GROUP, establishing both technical and organisational security measures appropriate to the type of information and specific to the client. We also promote a culture of security through the approval of a Security Policy, which includes suppliers, ensuring compliance by monitoring and controlling the measures.

7.- The LKS NEXT GROUP is committed to detecting security incidents, to taking the necessary measures to ensure that they do not happen again and to informing the interested parties of the facts.

8.- In the event of termination of the employment relationship, whether ordinary or special, with the LKS NEXT GROUP, the People's duty of confidentiality will be maintained and they will return any documents and storage media or devices, as well as the information stored in their computer terminal related to the Confidential Information.

6. RELATIONS WITH THE MARKET AND PUBLIC ADMINISTRATIONS

■ 6.1.- Truthfulness and Accuracy of the LKS NEXT GROUP's Assets And Liabilities

1.- The economic and financial information of the LKS NEXT GROUP is a true and fair reflection of its assets and liabilities, in accordance with generally accepted accounting principles and applicable international financial reporting standards.

2.- Nobody will conceal or misrepresent any information in the accounting records and reports of the LKS NEXT GROUP, which will be true and accurate.

3.- The LKS NEXT GROUP is committed to transmitting reliable information to the markets and to society in general, so that a true and fair view of the LKS NEXT GROUP can be formed.

■ 6.2.- Protection of Free Competition, Market and Consumer Protection

1.- The LKS NEXT GROUP undertakes not to be detrimental to free competition. The LKS NEXT GROUP complies with antitrust regulations, avoiding any conduct that constitutes or may constitute collusion, abuse or restriction of competition or price manipulation.

2.- No unfair conduct or misleading or denigrating advertising of the LKS NEXT GROUP's activity or that of its competitors or third parties will be carried out.

3.- The fees received reflect the value of services rendered and responsibilities assumed.

■ 6.3.- Cooperation and Transparency with Public Administrations

1.- Relations with authorities, regulatory bodies and public administrations are based on the principles of cooperation and transparency.

2.- The LKS NEXT GROUP complies with its obligations to the various Public Administrations, in particular those related to the Public Treasury and Social Security, as well as those in respect of which subsidies are received or the LKS NEXT GROUP is awarded public contracts, complying with the requirements of the applicable administrative regulations.

3.- Conduct aimed at avoiding tax obligations or obtaining benefits to the detriment of the Treasury, Social Security and equivalent bodies is expressly prohibited.

■ 6.4.- Relations with Suppliers, Partners and Clients

1.- In the selection processes for Suppliers, Associates and Clients, we must apply criteria of quality, opportunity, cost and sustainability, always acting in defence of the interests of the LKS NEXT GROUP.

2.- We will promote knowledge of and, as far as possible, compliance with this Code of Conduct among Suppliers, Associated Persons and Clients in order to better apply the Values and Ethical Principles contained therein.

7. ANTI-CORRUPTION POLICY

■ 7.1.- Preventing Private and Public Corruption

1.- The LKS NEXT GROUP declares that it is opposed to unlawfully influencing the will of persons outside the LKS NEXT GROUP in order to obtain any benefit or advantage. Acts of corruption or bribery are expressly prohibited, including the offer or promise, directly or indirectly, of any kind of illicit advantage, as well as influence peddling.

2.- As a result, in our relations with Suppliers, Associated Persons, Clients and Public Administrations, we must behave in such a way as not to induce a private individual, authority or public official to violate their duties of impartiality or any legal precept. The prohibitions set out in this paragraph also extend to persons closely linked by family or friendship to the individual, authority or public official concerned.

3.- The LKS NEXT GROUP will refrain from making, itself or through intermediaries, any donation, contribution, even in the form of a loan or advance, which involves the illegal financing of political parties.

4.- Gifts are intended to promote the brand image of the LKS NEXT GROUP. Gifts, favours or compensation, in cash or in kind, whatever their nature, may not be given or accepted, directly or indirectly, in order to unlawfully influence the relations of the LKS NEXT GROUP.

5.- The giving and acceptance of gifts are permitted when they are of negligible or symbolic financial value, and respond to signs of courtesy or customary business hospitalities.

6.- Where gifts offered or received do not comply with the requirements contained in this paragraph, they must be refused or returned.

7.- In certain circumstances and cultures, refusing a gift offered in good faith can show insensitivity or even damage a business relationship. In such circumstances, the gift will be accepted on behalf of the LKS NEXT GROUP, the person receiving the gift will immediately inform their direct superior and will deliver the gift to the HR Department, which, after issuing the corresponding receipt and including it in the LKS NEXT GROUP's gift inventory, will donate it to an objective of social interest.

■ 7.2.- Prevention of Money Laundering and Financing of Terrorism.

1.- The LKS NEXT GROUP will comply with the national and international provisions on money laundering and terrorist financing applicable to it.

2.- Client identification, reporting and internal control measures established for this purpose will be applied and there will be full cooperation with the authorities responsible for combating money laundering or the financing of any illegal activities.

8. ENVIRONMENTAL PROTECTION

1.- The LKS NEXT GROUP is firmly committed to the protection, conservation and improvement of the environment.

2.- We are actively and responsibly committed to environmental conservation, respecting legal requirements and following the recommendations and procedures established by the LKS NEXT GROUP to reduce the environmental impact of its activities. We must strive to minimise the environmental impact arising from the use of the facilities, assets and resources made available to us by the LKS NEXT GROUP.

9. APPLICATION OF THE CODE

■ 9.1.- Entry in Force

1.- This Code of Conduct has been in force since the approval of the Governing Board of LKS NEXT, S.Coop., that is, since 2 October 2020, and will remain in force unless expressly agreed to repeal, revise, update or bring into force a new Code of Conduct to replace it.

2.- Any breach of the Code of Conduct must be reported to the Regulatory Compliance Committee, which is the body responsible for ensuring compliance with this Code of Conduct and its correct application.

■ 9.2.- Interpretation of the Code of Conduct

1.- In the event of any discrepancy between this Code of Conduct and any Control that is part of the Compliance Programme, the Code of Conduct will prevail. Similarly, the Controls will be interpreted in accordance with the spirit and purpose of this Code of Conduct.

2.- The Regulatory Compliance Committee is responsible for interpreting the content of the Code of Conduct. Its interpretative criteria are binding for all its addressees.

3.- Any doubts that may arise regarding the interpretation of the Code of Conduct will be resolved by the Regulatory Compliance Committee, through communication to the Ethics Channel.

■ 9.3.- Regulatory Compliance Committee

1.- The Regulatory Compliance Committee is the body in charge of ensuring that the People who make up the LKS NEXT GROUP comply with the provisions of the Code of Conduct.

2.- The Regulatory Compliance Committee has competence in all matters pertaining to the Compliance Function. The composition, operation, functions and other aspects relating to the Regulatory Compliance Committee are regulated in its Regulations.

3.- The Regulatory Compliance Committee prepares and proposes the content of this Code of Conduct and the set of Controls that make up the LKS NEXT GROUP's Compliance Program, which are mandatory for all Persons.

■ 9.4.- Non-Compliance and Communication to the Ethics Channel

1.- Non-compliance with this Code of Conduct constitutes a breach of the Compliance Programme, and may give rise to labour or corporate sanctions, without prejudice to any administrative or criminal sanctions that may also result from non-compliance.

2.- Any Person who becomes aware of a Breach of this Code of Conduct or of the Controls must communicate it directly to the Regulatory Compliance Department through the Ethics Channel. Failure to communicate a Non-compliance of which you become aware will be considered a breach of this Code of Conduct.

3.- The concealment of a fact or incident regarding the violation of the law, the Code of Conduct or the Controls that develop it will not be understood as an action in the interest of the LKS NEXT GROUP.

4.- Communication to the Ethics Channel can be carried out by any of the following means:

- By sending an email to this address: canal.etico@lksnext.com
- By sending a letter to the attention of the Regulatory Compliance Coordination, to any of the offices of the LKS NEXT GROUP.

5.- The Communicator will be informed about the progress of the communication made to the Ethics Channel.

■ 9.5.- Confidentiality of Communications and Prohibition of Reprisals

1.- The LKS NEXT GROUP guarantees the confidentiality of the identity of the Persons who make communications to the Ethical Channel.

2.- All communications and procedures related to the Ethics Channel will be handled in compliance with the requirements of the regulations on personal data protection. However, the data of the Persons making the communications to the Ethical Channel may be provided to the administrative or judicial authorities to the extent that they are required to do so as a result of any proceedings arising from the communication.

3.- It is forbidden to take any action against a Person who is a member of the LKS NEXT GROUP that constitutes retaliation or any kind of negative impact for having made a communication. Retaliation against the person who has made such a communication will be considered a breach of this Code of Conduct.

4.- The prohibition of retaliation provided for in the preceding paragraph will not preclude the adoption of applicable disciplinary measures when the internal investigation determines that the communication is false and made in bad faith.

■ 9.6.- Processing the Communications

1.- A record will be kept of all communications received through the Ethics Channel.

2.- Upon receipt of a communication, an internal investigation will be launched, unless the communication is manifestly unfounded or concerns matters outside the Code of Conduct. In such cases, the receipt of the Communication and the decision made not to initiate an investigation will be recorded in the relevant Register of Communications. This decision will not preclude the subsequent initiation of an investigation should additional information be received.



3.- In the internal investigation carried out by the Regulatory Compliance Committee, this body may obtain all the information and documentation it deems appropriate from any area or business of the LKS NEXT GROUP.

4.- In the event that the communication affects a member of the Regulatory Compliance Committee, they may not participate in the processing and the rules on Conflict of Interest set out in Section 2.5 above will apply.

5.- This procedure will end with a resolution by the Regulatory Compliance Committee, which will contain a Corrective Action or Proposal that, where appropriate, will be approved by the Governing Board or the corresponding body. The Proposal will establish, where appropriate, the corresponding disciplinary measures in application of labour legislation and, in particular, the Workers' Statute and the applicable collective bargaining agreements and/or the Internal Regulations and any other social and labour rules applicable to the People who make up the LKS NEXT GROUP, all without prejudice to the administrative or criminal sanctions which, where relevant, may also be applicable.

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