



**EUROPA
EDUCATION**

CODE OF ETHICS

EUROPA EDUCATION GROUP

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1. INTRODUCTION

1.1. About us.

The Europa Education Group is a group of higher education entities comprised of private universities and private higher education centres within Spain and Portugal, providing education services to over 20,000 students from a range of different nationalities.

The Europa Education Group considers academic excellence to be one of its strategic pillars. Thus, our educational model has adopted and embraced the principles of the European Higher Education Area based upon the holistic learning of people. Pursuant to said model, professors are academic references for students and also provide advice and accompany said students throughout their entire university life. Students, in turn, embark upon their own educational path and develop the knowledge, skills, abilities and values required within current society. Our model places special emphasis on the maturity and autonomy of students, such that students learn how to adapt to an increasingly complex world which is constantly changing.

The mission of the entities of the Europa Education Group is to provide our students with an integral education, by forming leaders and professionals prepared to respond to the needs of a global world, to provide value within their professional careers and to contribute to social progress with entrepreneurial spirit and ethical values. Generate and transfer knowledge through applied research and investigation, and to contribute to progress, while being at the forefront of intellectual and technical development.

1.2. What the Code of Ethics is

The Code of Ethics of the Europa Education Group sets out the main principles and standards of conduct that must guide the conduct and practices in relation to the functions and actions of all persons that form part of the entities of the Europa Education Group.

For said purposes, this Code of Ethics is based, among other aspects, upon:

- The United Nations Universal Declaration of Human Rights.
- The principles of the United Nations Global Compact.
- Applicable law.
- Any other applicable regulation, in light of the specific activities of the different entities.

1.3. Principles and values

The members of the entities of the Europa Education Group shall perform their activities and shall promote, within the scope of their respective functions and responsibilities, based upon the following general principles and values:

A) Freedom, equality and non-discrimination.

At the Europa Education Group, the compliance, fulfilment and promotion of the principles of freedom, quality and non-discrimination, constitute a fundamental pillar for the tasks and functions carried out by all of the members of the entities thereof within their respective scopes of responsibility and, in particular, for the activities related to teaching and education.

The fundamental right to freedom of education constitutes the backbone of the academic activities, which is carried out within the context of university autonomy, the freedom of creation of education and teaching centres and universities, and respect for the institution and its reputation.

The employees and members of the entities of the Europa Education Group shall promote and support the principles of freedom, equality and non-discrimination as part of their daily activities.

B) Quality and excellence.

The entities of the Europa Education Group are particularly focused on the quality and excellence of the products and services that they provide, in order to exceed the common standards applicable to any education centre.

All of the educational activities are aimed at achieving a high degree of quality and excellence for education and the rest of the educational, research, organisational and any other types of services provided.

The Europa Education Group reaffirms its commitment to the establishment of standards that guarantee the fulfilment of the objectives of quality and excellence, standards that provide for the assessment of the quality of the product and educational service, as well as the compliance with the standards required in order to fulfil said objectives.

C) Responsibility and commitment to the institution, to our students and to society.

The entities of the Europa Education Group shall promote the cooperation and collaboration of their members for the enhancement and fulfilment of the mission of the institutions, and shall promote the diligent and loyal behaviour toward said institutions, in order to create an institutional relationship among all of the members thereof, committed to the improvement of the Universities and the Centres and the fulfilment of the objectives and purposes thereof.

Furthermore, in accordance with its social implication and commitment to society, the Europa Education Group shall promote and perform activities for interaction with the social environment and shall reject any antisocial or discriminatory conduct, while promoting the economic, social and environmental values and principles, in accordance with the principle of sustainable development.

D) Values

- **Responsible.** The assumption of responsibility for the results of the students constitutes the crux of the revolution that we are carrying out within the educational scope. We focus on students and employers in order to adapt our programs to their needs. We strive to maintain high student retention, graduation and employability rates, so that our students form part of the market and generate a positive social impact.
- **Collaborative.** We distinguish ourselves by our entrepreneurial spirit: we are resolute and bold people, and we put students at the centre. We collaborate and work together to implement the best practices at our institution.
- **International.** We have a worldwide vocation and scope while retaining deep local roots. We provide resources to support and strengthen local education. We are an inclusive and multicultural organisation that values diversity and that respects all points of view and cultural aspects.
- **Analytical.** By way of rigorous self-assessment we procure to constantly broaden our information and knowledge in order to improve our activities. This reflexive approach, based on analysis, distinguishes us as an institution.
- **Trustworthy.** We must earn the trust and confidence of our students and their families, the employers and the communities in which we operate. At all levels of our organisation, we are subject to the highest standards and requirements, and we act with integrity, while assuming the pertinent responsibility for our actions.
- **Bold.** We are entrepreneurs, and we are willing to act boldly and to run calculated risks although our decisions are based upon rational and reflexive planning. We move quickly to take advantage of opportunities and to produce positive changes in order to enrich the experience of our students. We search for new forms to improve our teaching without boundaries and to transform the traditional educational model. We have an innovative mentality and we provide the members of the university community with the opportunity to question the status quo. We apply creative approaches within the educational and company scope. We never cease to explore new approaches, new technologies, new business models and new theories. We are leaders, not followers.

2. WHO THE CODE OF ETHICS APPLIES TO

The scope of application of the Code of Ethics encompasses all of the people and groups that comprise the entities that form part of the Europa Education Group, which includes the university governance, the professors and the non-teaching departments. Moreover, the

principles and values thereof shall also extend to the relationships that the Europa Education Group and its staff have with third party service providers and their collaborators.

In particular, this Code of Ethics is applicable to:

1. All of the employees and people that provide services to the entities of the Europa Education Group, including staff that belong to teaching and non-teaching departments, clinics, faculties and schools, private or associated centres, and any other employees or people with an employment relationship with or that otherwise have been contracted by any of the entities of the Europa Education Group.
2. University governance and the governing bodies of the entities of the Europa Education Group, Governing Bodies, Management Committee, Academic Council, Advisory Councils, (hereinafter, also referred to as “Representatives”). For said purposes, the term Representatives shall be considered to include the legal representatives, including “*de iure*” directors authorised to adopt decisions on behalf of the entities of the Europa Education Group, and the “*de facto*” directors and other external bodies, and any natural persons or legal entities related to Europa Education Group by way of legal relationships and/or any other type of relationship other than employment relationships, which act on behalf thereof.
3. The Code of Ethics is applicable to all service providers, collaborators, agents and auxiliary companies, which must also work in accordance with the standards and rules of conduct set out in this Code of Ethics when they carry out commercial activities on behalf of the entities of the Europa Education Group or under the instructions thereof.

3. PEOPLE

3.1. Respect for people

The Europa Education Group and, in particular, the persons to whom this Code of Ethics is applicable, must:

- Respect at all times the dignity of people.
- Reject and prevent any type of intimidation, any type of harassment, whether psychological, moral or sexual, as well as any other conduct that represents a lack of respect or consideration or any other act of verbal or physical assault.
- Treat people in a fair and just way, and act with respect toward the diversity of cultures, religions, sexual orientations, opinions and/or civil status of people or any other personal or social condition whatsoever.

In relation to relationships between employees, irrespective of the type of relationship, as well as any relationships between employees and any of the companies, entities or people that collaborate with the entities of the Europa Education Group or that have commercial relationships with the Europa Education Group, respectful and professional treatment shall be of utmost importance for the purposes of creating a cordial and safe working environment.

3.2. Respect for our students

The persons to whom this Code of Ethics is applicable and, in particular, professors, must:

- Maintain a professional and mutually respectful relationship with students.
- Recognise the knowledge and capabilities of students that may contribute to the education/teaching process, thereby developing their education during the times and at the spaces established for said purposes and in fulfilment of the academic results in the periods established in the internal regulations.
- Perform their teaching activities with absolute respect for and compliance with the regulations of the Universities and Centres, as well as applicable legal provisions.
- Respect, within all ambits, the prestige, reputation and good name of the Universities and Centres, and of any of the members and students thereof.

3.3. Equal opportunities

The persons to whom this Code of Ethics is applicable and, in particular, the employees that are responsible for functions of team selection or team leadership, must:

- Comply with, at all times, the principle of equal opportunities, and must always act with absolute objectivity and in light of, in any event, the suitability of the profiles of the candidates in respect of the needs to be covered thereby.
- Respect the right of people to work for or collaborate with the entities of the Europa Education Group, and to not prevent the promotion thereof or the development of their professional career by reason of race, religion, sex, sexual orientation, origin and/or civil status, or any other personal or social condition.
- Promote cultural diversity by creating an employment environment in which people have the opportunity to develop both professionally and personally.

3.4. Prevention of workplace, sexual and moral harassment.

All people have the right to be treated with respect, dignity and justice, and accordingly shall be provided with a workplace free from any type of harassment or bullying.

No type of harassment or bullying shall be tolerated vis-à-vis the members of staff or any third parties. Likewise, sexual harassment shall be categorically forbidden vis-à-vis any employees, or any third parties with which any type of professional relationship exists.

For said purposes, all pertinent measures shall be adopted in order to investigate any intimidating conduct, as well as any type of psychological, labour, moral or sexual harassment whatsoever. In relation to teaching staff and the non-teaching staff that provide their services at any of the entities of the Europa Education Group, the Internal Action Protocol for the Prevention of Workplace Harassment of the Europa Education Group shall be applicable thereto.

3.5. Data protection

The persons to whom this Code of Ethics is applicable must:

- Only use the personal data that is absolutely necessary for carrying out their functions and activities.
- Keep the personal data confidential, and act diligently and lawfully in respect thereof.
- Follow the procedures established by the Europa Education Group in accordance with the data protection policies, such that:
 - A sufficient legal justification exists, whether the consent of the interested party or any other legal justification provided for under applicable regulations, for the processing of the personal data thereof.
 - The right of information of the interested parties whose personal data is requested is duly safeguarded, together with the right to the identity of the data controller and the contact particulars thereof, the purposes of the data processing, the mandatory or voluntary nature of the responses to the questions set out, the consequences of the data collection, the possibility to exercise the rights of access, rectification, cancellation, objection, data portability and limitation, as well as any other right applicable thereto.
 - The interested person is able to exercise of the rights of access, rectification, objection, erasure, cancellation, data portability and limitation, in accordance with data protection regulations.

- The personal data of third parties is only used for purposes compatible with the purposes for which the data has been collected.
- Keep strictly confidential and secret all of the personal data of customers and of any other person whatsoever, and to store said personal data. This obligation shall remain in force even after the termination of the employment or professional relationship with the Europa Education Group.
- Assign or disclose the personal data only in the situations provided for at law.
- Adopt all of the necessary and adequate technical and organisational measures to ensure the security of the personal data and to prevent any alteration, loss, or any unauthorised processing or access thereof.
- Notify any security breaches that take place in relation to the personal data to the Data Protection Officer (DPO), as soon as knowledge exists of said security breaches.
- Participate in the educational activities carried out by the Europa Education Group.
- Diligently collaborate with the Europa Education Group in relation to all issues that may arise in relation to data protection and, in particular, in relation to any requests for information or any inspection activities.
- Comply with the policies, processes and instructions received from the Europa Education Group and, as the case may be, from the compliance body responsible for data protection.
- Collaborate with the body responsible for data protection compliance for the exercise of the functions thereof.

3.6. Conflicts of interest.

The employees of the Europa Education Group must strictly comply with their professional duties and responsibilities and must not carry out any professional activities outside of the institution that may directly compete or constitute any conflict of interest in relation to their activities within the institution, unless specifically and expressly authorised by the persons designated for said purposes by the Europa Education Group.

In any situations in which there is any possibility that personal interests may be in conflict or interfere, whether directly or indirectly, with the interests of the Europa Education Group, the employee in question must immediately inform the Regulatory Compliance Body thereof.

3.7. Health and safety

The Europa Education Group assumes the commitment to ensure an adequate level of protection regarding the risks related to its activities, as well as to promote improvements to the health and safety conditions. Accordingly, a primary objective of the Europa Education Group is to integrate prevention aspects within all hierarchical levels and in relation to all of the activities thereof, whether in relation to teaching, administrative or research and investigation scopes. In this regard, the entities have adopted an occupational hazards prevention plan, which establishes a framework that sets out the general guidelines regarding the activities that must be carried out in relation to occupational hazards prevention, both to comply with applicable legal requirements, as well as to ensure the continuous improvement thereof and to disseminate said provisions to each and every one of the members of the organisation.

In order to comply with the foregoing commitment, the Spanish institutions of the Europa Education Group have implemented an occupational hazards prevention management system based upon the ISO 45001:2018 standard. Said institutions have also implemented an occupational hazards prevention plan, which is implemented by way of specific procedures and instructions to achieve the integration of occupational hazards prevention within the activities of the Universities and Centres.

4. SOCIAL RESPONSIBILITY AND THE ENVIRONMENT

4.1. Social responsibility.

The Europa Education Group is strongly committed to social progress through education, the talent of our university community and the positive impact that said talent generates in society. Accordingly, the Europa Education Group implements measures and actions for promoting social entrepreneurship, for promoting diversity (carrying out different actions for the raising of awareness of the university community), as well as for the promotion of volunteer activities, among others.

The Europa Education Group assumes the commitment to manage its institutions in a sustainable way within the economic, social and environmental ambits, in order to create value for the groups of interest from a triple perspective: economic solvency, social commitment and respect for the environment.

Likewise, the Europa Education Group promotes curricular sustainability for students for the purposes of forming professionals committed to sustainable development, within the economic, social and environmental ambits, which contribute their individual skills and capabilities to the promotion of positive social changes.

4.2. The environment.

The Europa Education Group is committed to environmental protection, animal welfare and sustainable development, and adapts its activities and procedures to the legal framework and to the commitments established by the European Union and the rest of the organisations in the growing fight against pollution.

The Europa Education Group assumes and ratifies the action principles for the protection of the environment and animal protection as formulated in the different applicable legal rules and environmental policy declarations, which constitute the basis for the planning and development of all of the activities thereof.

The Europa Education Group educates its students about values and conduct that is respectful to the environment, so as to ensure that future professionals are also citizens that understand and promote the need for sustainable development.

5. GOVERNANCE

5.1. Transparency.

The principle of transparency constitutes a fundamental principle for the functioning of the Europa Education Group. The university governance, managers, as well as the rest of the staff that provide services to the Europa Education Group, shall exercise their functions and carry out their activities with absolute transparency.

Moreover, the foregoing principle of transparency requires that all of the public information and communication provided within the university scope must be easily accessible, understandable and duly verified.

5.2. Confidentiality.

The Europa Education Group shall safeguard and protect all of the confidential information thereof, and shall strictly safeguard the privacy thereof. All persons to whom this Code of Ethics is applicable must abstain from inadequately or improperly using or disclosing to any third parties any data, documents or information of a strategic or confidential nature obtained or related to the entities of the Europa Education Group.

The confidential information includes not only the data the property of the Europa Education Group or the private information of third parties, but also includes the data that the students or any other parties have provided to any entity of the Europa Education Group.

5.3. Obtaining information.

The persons to whom this Code of Ethics is applicable must:

- Obtain commercial or market information without breaching the legal rules or private covenants established to protect said information.
- Reject and avoid the use of any information that may have been obtained in breach of any legal rules or private covenants formalised by the entities of the Europa Education Group.
- Formalise contractual clauses for the purposes of avoiding the disclosure or transfer of confidential and/or restricted information that may breach the principle of trade secrets.

5.4. Industrial and intellectual property.

The Europa Education Group is committed to the protection of intellectual and industrial property, including, copyright, trademarks and patents, domains, designs, etc.

The Europa Education Group and, in particular, the persons to whom this Code of Ethics is applicable must:

- Adopt all necessary measures to protect the intellectual and industrial property.
- Avoid the use of the works or creations of third parties subject to intellectual and industrial property rights without the pertinent rights and/or licences.
- Use only the images, trademarks and texts for which the corresponding authorisation has been obtained or that are not protected by copyright or intellectual and industrial property rights.

5.5. Information on social media.

The use of social media must not impair or adversely affect the name, reputation or the prestige of the entities of the Europa Education Group, or any of the members or students thereof.

The use of social media shall be carried out avoiding any action that may damage the entities of the Europa Education Group, or the members or students thereof.

The persons to whom this Code of Ethics is applicable must:

- Abstain from publishing any content as representatives of the Europa Education Group unless they have express authorisation for said purposes.

- Abstain from publishing any confidential information of the Europa Education Group, or of the students or collaborator entities.
- Abstain from using the logotypes, commercial trademarks, information subject to copyright or any other intellectual or industrial property rights of the Europa Education Group, without express authorisation.

The persons to whom this Code of Ethics is applicable must not respond directly to any request for information from any news media whatsoever. All queries from news media in relation to the entities of the Europa Education Group must be forwarded directly to the Communication Department.

5.6. Compliance with laws, rules and regulations

The persons to whom this Code of Ethics is applicable must comply with all laws, rules and regulations in force in the countries where the entities of the Europa Education Group operate and must implement all adequate measures that ensure the necessary compliance with said laws, rules and regulations.

6. PRESERVATION OF THE REPUTATION AND PUBLIC IMAGE OF THE EUROPA EDUCATION GROUP. DUTIES OF DILIGENCE AND DECORUM.

6.1. Reputation and public image of the Europa Education Group

The Europa Education Group considers its corporate image and reputation to be one of its most important assets for maintaining the trust and confidence of students and their families, the public authorities and general society. The persons to whom this Code of Ethics is applicable, and in particular all employees of the Europa Education Group, must abstain from carrying out any statements or actions that may jeopardise or undermine said asset and they must also take special care to protect the public image and reputation of the Group through diligent and adequate conduct, taking into account, at all times, the effects that each one of their actions may imply for the good name and reputation of the institutions of the Europa Education Group.

6.2. Duty of diligence

The persons to whom this Code of Ethics is applicable, and in particular all employees of the Europa Education Group, have a duty of care and diligence toward the Group and toward the entities that form part thereof, and accordingly, during the exercise of their professional functions and duties, said persons must contribute to the prestige, dignity and reputation of the Group that they represent and that they form part of, and must avoid any conduct, statements or attitudes that may jeopardise or undermine the good name and image of the Group vis-à-vis the students, public authorities and the general society, and must act diligently and in accordance with the values and principles of this Code of Ethics.

The foregoing duty of diligence includes the obligation of the persons to whom this Code of Ethics is applicable to abstain from discrediting, bringing into disrepute, making derogatory comments or disclosing the terms of private conversations (or inducing or encouraging others to discredit, bring into disrepute, carry out derogatory comments or disclose private conversations) in relation to the Europa Education Group or any of the entities that form part thereof, regarding, or in respect of, any of the managers, directors, shareholders or employees thereof, by way of communication with students, employees, news media, service providers or third parties.

For the purposes of this section, the term “bring into disrepute” shall mean any comment, statement or disclosure of conversations that may adversely affect the activity of the Europa Education Group or that may have an impact in the image or reputation of the Group and/or its entities, managers, shareholders, directors, employees or any third parties related to the institutions thereof.

Any breach of the obligations provided for in this section shall entitle the Europa Education Group to adopt the disciplinary measures that it considers appropriate and/or to claim the losses and damages caused thereto, as the case may be.

6.3. Decorum

The persons to whom this Code of Ethics is applicable must act at all times with the necessary decorum during the carrying out of their professional functions and, in particular, while said persons are situated or are using the facilities or represent the entities of the Europa Education Group.

7. STUDENT ORIENTATION

The students and their educational needs constitute the most important aspect of the activities of the Europa Education Group. The persons to whom this Code of Ethics is applicable and, in particular, the employees that have direct contact with the students, must prioritise the satisfaction of the needs of the students and diligently comply with all of the functions and tasks that correspond thereto in relation to the provision of their services for the Group, and said persons must also diligently comply with all of the procedures and deadlines established internally by the Europa Education Group.

8. USE OF ELECTRONIC DEVICES THE PROPERTY OF THE EUROPA EDUCATION GROUP

The Europa Education Group provides its employees with certain different computer equipment and tools which are the property of the Europa Education Group, which include PCs, applications and computer programs, internet connections and email services.

The proper and adequate use of the computer equipment and tools is the responsibility of the employees that use said equipment, and said employees must use said equipment and tools properly and must abstain from any conduct or actions that may be considered to be abusive or improper.

By way of example, the following conduct is categorically forbidden:

- (i) The intentional alteration of the software of the equipment for any purposes other than for professional activities.
- (ii) The installation and use of any computer application, file, image, document, screensaver, game or program for which the Europa Education Group does not hold the corresponding licence and/or that is offensive, inappropriate, pornographic or discriminatory.
- (iii) The intentional and unauthorised access to files that contain confidential or restricted information, as well as the use and manipulation of said information.
- (iv) The abusive access to webpages that do not constitute part of any provision of services or that have an offensive, inappropriate, pornographic or discriminatory content, as well as the access to chats for personal use.
- (v) The sending or receipt via email of applications, files and documents not related to the professional services thereof, using the corporate image of entities of the Europa Education Group, the interception and/or unauthorised use of the email of other users, the sending of anonymous or mass emails and/or the opening and use of unauthorised personal email accounts using the computer equipment which are the property of the Europa Education Group.

The use of the computer equipment and tools by employees shall be solely and exclusively limited to the carrying out of professional activities and tasks, and accordingly said equipment and tools may not be used for any personal or private use whatsoever, using the corporate image of the entities of the Group. Exceptionally, employees shall be permitted to occasionally access the internet and use email when said activities are absolutely necessary or are related to the necessary work/life balance which is only able to be carried out using said equipment and tools, in order to avoid the absence of said employee from his or her employment position. Said personal use must, in any event, be carried out only occasionally and shall be subject to and conditional upon the principle of the diligent use thereof. Under no circumstances whatsoever must said personal use interfere with the work or performance of the employee or of any other co-worker.

9. FINANCIAL CONDUCT RULES

9.1. Registers and data

The persons to whom this Code of Ethics is applicable and, in particular, the employees that carry out financial and accounting types of functions, must:

- Monitor any financial flows that may have a criminal origin or destination.
- Inform and provide accurate and justified information to the corresponding finance manager, in relation to said facts, circumstances or situations that, in relation to the carrying out of the activities thereof and in light of the importance of said facts, circumstances or situations, may significantly affect the result of the entities of the Europa Education Group.
- Set out fully and accurately, at all times, the economic and financial situation of the Europa Education Group.
- Abstain from communicating to any other unauthorised persons any financial information or non-financial information regarding the entities of the Group.
- Not disclose any information regarding the economic and financial situation of the Europa Education Group that may create a distorted or inaccurate image of the actual situation of the Group.
- The information of the Europa Education Group regarding the economic and financial situation thereof that is published and provided to official bodies and, generally speaking, which is officially disclosed, must constitute accurate information regarding the economic and financial situation of the Europa Education Group and the corporate and organisational structure thereof.

9.2. Payments and collections

The persons to whom this Code of Ethics is applicable and, in particular, the employees that perform executive functions within entities of the Europa Education Group, must:

- Minimise, and if possible completely remove, payments and collections related to commercial operations with cash.
- Take special care to review and control all of the payments or collections:
 - a. carried out by or to a company with which a commercial relationship has been established for the first time;

- b. executed by a company whose payments or collections come from or must be paid into an account other than that which the company has normally been using in its commercial relationships with the Europa Education Group
 - c. carried out or received from an account or by a company situated in countries that are not fiscally transparent;
 - d. carried out by or to natural persons or legal entities not referred to in the corresponding contracts; and
 - e. carried out by or to companies in respect of which it is not possible to identify the shareholder, owner or ultimate beneficiary thereof.
- Take special care to review the extraordinary payments not provided for in the corresponding agreements or contracts.
 - Comply, at all times, with the policies established by the finance manager in relation to the payments and collections, and all payments or collections that do not comply with said policies or with applicable regulations must be reported thereto.
 - Set out clearly and precisely, in the registers of the Europa Education Group, all of the transactions, operations, movements of goods and the contracting of services.

9.3. Contracts and procurements policy

The employees of the Europa Education Group must comply with the processes and procedures provided for in the contracts and agreements policy, prior to the formalisation thereof by the designated empowered person or legal representative, as well as the provisions of the procurements policy.

9.4. Regarding corruption, suppliers and gifts.

The Europa Education Group and, in particular, the persons to whom this Code of Ethics is applicable, must:

- Abide by the rules of free competition, establishing as an action principle the importance of transparency in all commercial relationships with third parties.
- Govern all commercial relationships by objective criteria regarding price, quality, reliability and suitability of the product and necessarily in strict compliance with the legal rules applicable within the jurisdiction where the commercial relationships are performed.

- Abstain from providing any type of gift, benefit, present or remuneration whatsoever to any public civil servant or authorities.
- Abstain from providing gifts, benefits, presents or remuneration to any third parties during the course of negotiations or when public tenders are being conducted.
- Abstain from accepting or providing gifts, benefits, presents or remuneration to third parties, except in the case of promotional gifts previously authorised by the Regulatory Compliance Body, provided that the recipients thereof are not public civil servants or authorities.
- Any offering or acceptance of gifts in cash is expressly prohibited.
- The prohibition of gifts and benefits extends to any type of present, with the exception of the types of gifts already accepted and established as standard gifts within social relationships.
- Limit any offering or acceptance of invitations to professional events, occasionally and reasonably, when said invitations strictly relate to the professional activities thereof.
- Ensure the transparency and fairness of the references and contracts, based upon objective criteria.
- Inform the Regulatory Compliance Body of the Europa Education Group of the receipt or offering of advantages or personal favours of any type whatsoever, for the purposes of the adoption of the measures established for said purposes under applicable regulations.
- Substantiate by way of the corresponding invoices, receipts and documents, all of the costs and expenses incurred as a result of the gifts, promotional campaigns, etc., as a result of the activities of the Europa Education Group, which must state the date of the expense, the description thereof, the identity of the person to whom the gift is provided and the reason why said gift was provided.
- Ensure that the actions and activities of the Europa Education Group in relation to public tenders, contracts with the public administrations, independent bodies, state-owned enterprises or public capital companies of any nationality and/or country whatsoever, duly comply with the requirements regarding transparency and legality.
- The Europa Education Group must act within the market in a diligent, serious and responsible way, and must avoid any participation or involvement in any type of

fraudulent or misleading conduct whatsoever that does not comply with the applicable criteria of good faith and due diligence in relation to its corporate activities.

9.5. Prevention of money laundering and the financing of terrorism.

The persons to whom this Code of Ethics is applicable must act, at all times, in accordance with the provisions of all applicable law regarding the prevention of money laundering and the financing of terrorism as well as any other applicable law in force in Spain and Portugal.

10. COMPLIANCE

10.1. Application, Acceptance, Dissemination.

The Code of Ethics is applicable to all people, groups and entities that form part of the Europa Education Group, as described in section 3 of this document, including the relationships of the Europa Education Group and its staff with external entities and companies that provide services or that collaborate with the Europa Education Group.

All of the persons to whom this Code of Ethics is applicable must formally undertake to accept, adhere to and promote all of the principles and the values that comprise this Code of Ethics.

The dissemination of this Code of Ethics shall be carried out by means of the publication thereof on the corporate websites of the entities of the Europa Education Group and shall be subject to the pertinent actions for communication, training and the raising of awareness thereof for the adequate understanding and implementation thereof.

10.2. Regulatory Compliance Body.

The monitoring and improvement of the compliance and interpretation of this Code of Ethics shall correspond to the Criminal Risks Prevention Committee, referred to, for the purposes of this document, as the Regulatory Compliance Body, designated by the Europa Education Group, which shall also be responsible for ensuring the due compliance therewith, for resolving any questions related to the terms thereof or any doubts regarding the interpretation thereof, for receiving notifications of any possible inadequate conduct, for resolving any problems as well as any other issue that may arise within the scope of application thereof.

10.3. Breaches.

For the benefit of the Europa Education Group and of all of the entities that form part thereof, the recipients of this Code of Ethics, must inform of any conduct or practices that breach the principles or values thereof. In said cases, the Europa Education Group shall implement the necessary procedures for the investigation of the facts and for the identification of the persons

liable for said breaches, and shall adopt the decisions considered necessary in light of the seriousness of the breach.

10.4. Whistleblowing Channel.

In order for the persons to whom this Code of Ethics is applicable and those linked to them under the terms provided for by law, to be able to notify the corresponding control body of a possible breach thereof, the Europa Education Group has established a system for the formal notification of any breaches, including anonymously, based upon the duty of honesty in relation to the reported accusations, via the following link: <https://europaeducation.shogunmonitor.com/>

In application of the provisions of Spanish Law 2/2023, of 20 February, regulating the Protection of Persons Reporting Regulatory Offences and the Fight against Corruption, the Europa Education Group shall establish all of the necessary measures and precautions in order to ensure the confidentiality of all of the personal particulars of the persons affected by the information provided, in particular the personal particulars of the person that has reported the facts to the Europa Education Group, which shall not face any adverse consequences or reprisals for having reported said breach.

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