

# EMPLOYMENT POLICY FOR FORMER EMPLOYEES OF THE COMPANY'S AUDITOR

Prepared by	Revised by	Approved by
Human Resources Department	Internal Audit Department	CEO



**Neinor**  
HOMES

Revision control		
Revision	Date*	Description of changes
Rev 0	31/10/2017	Initial version of the Policy

\*Date of the Committee at which the procedure is presented for approval

### TABLE OF CONTENTS

<b>1. General features .....</b>	<b>3</b>
<b>2. Purpose .....</b>	<b>3</b>
<b>3. Scope.....</b>	<b>3</b>
<b>4. Description of the Operating Rules .....</b>	<b>3</b>
<b>5. Supervision and control of the Policy .....</b>	<b>5</b>
<b>6. Entry into force and validity .....</b>	<b>5</b>

---

## 1. General features

---

As established in the approved Regulations of the Audit and Control Committee, this Committee has among its functions: "to agree with the Board an employment policy for former employees of the Company's auditor and to supervise the application of this policy".

In this connection, the Audit and Control Committee of Neinor Homes S.A. (hereinafter, "Neinor Homes" or the "Company") has approved this Policy in order to comply with the basic principles of business ethics and professional integrity.

---

## 2. Purpose

---

The purpose of this document is, therefore, to establish guidelines for conduct that will govern the process of hiring employees who previously belonged to any of the audit teams of the professional firm proposed for the audit of this fiscal year or of the three previous years of Neinor Homes.

---

## 3. Scope

---

This Policy is applicable to the incorporation of employees to the Neinor Homes Group and its dependent subsidiaries that originate from professional audit services firms that have done work for the Company.

---

## 4. Description of the Operating Rules

---

The hiring of employees who have been part of the audit companies auditing Neinor Homes will follow the usual process established by the Company for the selection and hiring of new employees; therefore, it falls within the guidelines defined by the Human Resources Department.

In this connection, the candidate must meet the minimum requirements of the position to be filled that are required by the Management of the department requesting the hiring. To do so, initially the requesting department will define the functions and requirements (knowledge, specific training, skills, abilities, etc.) of the candidates it needs, as well as

the reason for the need, filling out a professional profile application form, a standard defined document in Neinor Homes. This position request will be agreed with the Human Resources Department.

Once the profile of the required vacancy is available, the assessment of the suitability of the candidate who has been a former member of the auditor of the Company, as well as of the rest of the candidates for the position, will be carried out in an objective, impartial and non-discriminatory way.

In this connection, it is expressly forbidden to give any favourable treatment to the candidate due to having worked for Neinor Homes beforehand. Therefore, the selection of the candidate will be subject exclusively to whether the person meets the necessary conditions established by the requesting department and agreed with the Human Resources Department, Neinor Homes giving equal treatment to all applications received.

In the event that a candidate belonging to the professional firm that performs the audit of financial statements, however, has not participated in any of the jobs contracted by Neinor Homes, the selection process will be the usual one indicated by the Company's Human Resources Department, not requiring communication to any department of the company.

However, when the person applying for the position has participated in any of the services provided to Neinor Homes, two actions will be taken, depending on the professional category of the candidate:

- If it is a person with assistant or senior status, i.e. who is in his/her first 5 years of experience, the Human Resources Department will report the candidacy to the Internal Audit Department so that they can assess it and give an opinion, which must be taken into account.
- If it is a person who is a manager or partner, said case will be reported to the Audit and Control Committee for the assessment of the possible hiring thereof, after analysing his/her independence and capabilities, also considering the possible existence of conflicts of interest.

---

## **5. Supervision and control of the Policy**

---

The Audit and Control Committee will verify and supervise the compliance and application of this Employment Policy for former employees of the Company's auditor, informing the Board of Directors when a hiring of this kind is made.

---

## **6. Entry into force and validity**

---

This Employment Policy for former employees of the Company's auditor comes into force upon its approval by the Neinor Homes Audit and Control Committee on 31 October 2017.