

CODE OF CONDUCT FOR THIRD PARTIES

Prepared by	Revised by	Approved by
Governance, Risk and Compliance, Internal Audit & ESG Department	Head of Governance, Risk and Compliance, Internal Audit & ESG	Monitoring and Control Committee



Neinor
H O M E S

Revision control		
Revision	Date *	Description of changes
1.00	13/12/2017	Approval of initial version
2.00	21/06/2022	Ethical channel data update and minor changes

* Date of the Committee when the procedure was presented for approval (except in the case of immaterial changes that do not modify the established operations and protocols and that, in turn, are always made to increase the company's level of assurance, in which case they will be approved by the Head of Governance, Risk and Compliance, Internal Audit and ESG).

TABLE OF CONTENTS

1. Context, scope and changes	4
2. Principles and values in relation to our third parties	5
2.1. Compliance with legal and tax obligations	5
2.2. Compliance with occupational health and safety obligations	6
2.3. Anti-bribery, anticorruption and prevention of criminal offenses.....	6
2.4. Fair competition.....	6
2.5. Conflicts of interest.....	6
2.6. Confidentiality	7
2.7. Intellectual property	7
2.8. Human rights.....	7
2.9. Sustainability	7
3. Operation of the Code of Conduct for third parties.....	9
3.1. Publication and dissemination	9
3.2. Acceptance	9
3.3. Breaches.....	9
3.4. Communication Channel	9
4. Annex I. Confirmation of acceptance of the Code of Conduct for third parties	10

1. Context, scope and changes

Context

The Code of Conduct for third parties (hereinafter, the Code) is published with the aim of defining the highest ethical standards which all significant third parties covered by it and that provide some kind of service to Neinor Homes (hereinafter, the company or Neinor Homes) must comply with.

Neinor Homes is committed to raising awareness of the Code with third parties with which it works and expects these principles and values to be communicated to everyone with whom they work.

The third parties assume responsibility for decisions regarding management of work performed and of the workers involved in the services provided to Neinor Homes.

Neinor Homes will refrain from working with those third parties that do not comply with the provisions of this Code and reserves the right to terminate the business relationship with those who fail to comply.

The conditions set out in this Code, and the service levels agreed in the contract and the supporting documentation, may be audited by Neinor Homes.

Scope

This Code will apply and will be provided together with the contract to any third parties or providers that provide services to Neinor Homes under the framework agreement or standard agreements of the company and/or who provide the following services:

General Management	Types of services
DGO	Architects; Builders; Intermediate builders; Urban infrastructure builders; Geotechnical; Quality control; Health and safety (ISS) coordinator; Engineering; Technical Inspection Organisation (OCT); Kitchen furniture; Topographical.
DGC	Legal advice; IT; HR; Consultancy; Insurance; Travel; Rent and office cleaning; Messenger service; Post; Materials; Custody and destruction of documents; Management of payment of property tax (IBI), fees and associations; Management of sales, capital gains and rents; Occupied property management.
DGI	Sales; Marketing; Due diligence; Appraisals.
DGN	Neinor Experience, Digital Transformation, Planning Management.
DGF	External Audit; Tax advice, Technology (Website, Webcast and Bloomberg); Exchange agent/broker and other R.I. management services

This Code does not apply to consultants who provide real estate brokerage services; these will be covered by the Neinor Homes Code of best practices in the real estate mediation services.

If there is any doubt or query regarding the application of this Code to a third party, the query should be made through the company's Ethics Channel <https://neinorhomes.integrityline.com/frontpage>.

Change

The Governance, Risk and Compliance, Internal Audit & ESG Department will review this Code periodically. If there are significant changes, it will submit it for approval to the Audit and Control Committee. If, on the contrary, the changes are not significant, it will submit it for approval to the Monitoring and Control Committee and will report on the changes made annually to the Audit and Control Committee.

2. Principles and values in relation to our third parties

Set out below are the ethical principles and values of Neinor Homes based on market best practices and on the principles of the UN Global Compact that our third parties must comply with:

2.1. Compliance with legal and tax obligations

To act in good faith, with strict compliance at all times with applicable legal and tax obligations and with the provisions of the relevant agreements, contributing, if requested, to provide all the information required in a full, accurate and truthful manner.

To meet obligations regarding employment and social security matters, ensuring that workers are in a regular employment situation, that payments due to both workers and the corresponding bodies are made correctly and in a timely way and that they have the specific certifications or qualifications to perform their tasks.

In this regard, upon the signing of the acceptance of this Code (see Annex I), the signatory declares to be up to date with all legal and tax obligations.

2.2. Compliance with occupational health and safety obligations

To promote a safe and stable workplace and take the occupational risk prevention measures appropriate to each workplace. To strictly comply with the requirements of Neinor Homes and the applicable legislation, assuming liability in this area during the performance of the contracted activities.

The company values positively that third parties have a certified Health and Safety Management System.

2.3. Anti-bribery, anticorruption and prevention of criminal offenses

To perform professional activities with a behaviour based on integrity and professional ethics, working against corruption in all its forms, including the elimination of extortion and bribery, as well as money laundering.

Not to offer or accept, solicit any benefit or advantage of any kind not justified with the aim of favoring the company vis-à-vis third parties.

To prevent the commission of criminal offences to which its business is exposed, and in the case of being, or having been in the last 4 years, involved in any criminal proceedings (accused or subject to a final judgment) to report it to the company's Ethics Channel <https://neinorhomes.integrityline.com/frontpage>.

2.4. Fair competition

To not participate in any misappropriation of confidential information, price fixing, bid rigging or collusive conduct relating to transactions affecting Neinor Homes. Third parties are expected to understand and comply with all applicable antitrust and fair competition laws.

2.5. Conflicts of interest

To avoid those contracts that involve a conflict of interest or a related transaction pursuant to Order EHA 3050/2004 and defined in Annexes 2 and 3 of the Conflict of interest and related parties transactions policy published on the company's website: <https://www.neinorhomes.com/en/responsible-business-and-innovation/compliance/conflict-of-interest-and-related-parties-transactions-policy/>

In the event of detecting a possible conflict of interest or related transaction, report it to the company's Ethics Channel <https://neinorhomes.integrityline.com/frontpage> to obtain authorization.

2.6. Confidentiality

Not to misuse confidential or proprietary company information, even after the relationship with the company has ended, i.e. third parties may only use such information for the development of the project for which they have been hired, and cannot share such information with other third parties.

In this regard, the use of insider information to buy and sell shares of the company or its use on behalf of competitors is prohibited. In addition, the contractual clauses related to data protection and confidentiality established in the signed contract of provision of services between the parties must be respected.

2.7. Intellectual property

Not to use the name Neinor Homes, nor of our logos, trademarks or any other identifying distinctive signs, except for those cases where authorization has been obtained through the company's Ethical Channel <https://neinorhomes.integrityline.com/frontpage>.

2.8. Human rights

To respect the principles and values relating to human rights, contributing to:

- Support and respect the protection of human rights enshrined internationally.
- Ensure non-complicity in human rights abuses.
- Eliminate all forms of forced or compulsory labour.
- Effectively abolish child labour.
- Eliminate discrimination in respect of employment and occupation.
- Ensure respect for gender equality and diversity.

2.9. Sustainability

In accordance with the Neinor Homes Sustainability Policy, we support preventative methods in relation to environmental challenges; we adopt initiatives to promote greater environmental responsibility and to encourage sustainable construction.

We expect our third parties to actively work for environmental protection, applying the appropriate measures to prevent and minimize any possible negative environmental or social impact on the environment.

The company values positively that third parties have a certified Environmental Management System.

3. Operation of the Code of Conduct for third parties

3.1. Publication and dissemination

This Code will be published on the Neinor Homes website (<https://www.neinorhomes.com/en/responsible-business-and-innovation/ethics/code-of-conduct-for-third-parties/>) and will be provided together with the contract to third parties to obtain their acceptance (see Annex I).

3.2. Acceptance

All third parties covered by this agreement must confirm their understanding and acceptance of the principles and values mentioned in this Code by accepting it (see Annex I).

3.3. Breaches

Neinor Homes will refrain from working with those third parties that do not comply with the provisions of this Code and we reserve the right to terminate the business relationship with those who fail to comply with it.

3.4. Communication Channel

All inquiries, requests for authorizations and possible complaints related to this Code or to misconduct observed among Neinor Homes personnel must be notified through the company's Ethics Channel <https://neinorhomes.integrityline.com/frontpage>.

This channel will be managed internally by the Neinor Homes Monitoring and Control Committee following the Ethical Channel management procedure published on the company's website.

4. Annex I. Confirmation of acceptance of the Code of Conduct for third parties

Mr/Ms. _____, as authorised representative of the company _____, which maintains a relationship with NEINOR HOMES for the provision of services of:

Undertakes to comply with all the requirements mentioned in the Code of Conduct for third parties¹ and in particular with the ethical values and principles of Neinor Homes founded on the best market practices and the principles of the UN Global Compact:

- Compliance with legal and tax obligations.
- Compliance with occupational health and safety obligations.
- Anti-bribery, anticorruption and prevention of criminal offences.
- Fair competition.
- Conflicts of interest.
- Confidentiality.
- Intellectual property.
- Human rights.
- Sustainability.

Also undertakes to use the Ethical Channel <https://neinorhomes.integrityline.com/frontpage> to request authorizations or report criminal offences, conflicts of interest and use of intellectual property mentioned in this Code.

First name and surname(s): _____

National ID Document (DNI): _____

Signed: _____

In _____, on _____

¹ The third party will send the confirmation with the signed agreement for the provision of services and it will be kept by the head of services procurement of Neinor Homes.