

ETHICAL CHANNEL MANAGEMENT PROCEDURE

Prepared by	Reviewed by	Approved by
GRC Management	CEO	Audit and Control Committee



Neinor
H O M E S

Revision control		
Revision	Date*	Description of changes
Rev 0	06/14/2017	Initial version of the procedure
Rev 1	05/10/2018	Rights of data subjects
Rev 2	15/03/2022	Update of regulatory reference and other minor changes
Rev 3	XX/XX/2022**	Compliance with EU directive 2019/1937

* Date of the Committee at which the procedure is submitted for approval

** The procedure is in effect and will be approved at the June 2022 session.

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1. Nature, purpose, scope and modification

Nature and purpose

The whistleblower management procedure (hereinafter, "the Procedure") is published so that the employees of Neinor Homes, S.A. and its subsidiaries (hereinafter, "the Group" or "Neinor Homes"), as well as its other stakeholders, have a mechanism with regard to how to proceed with the management of the whistleblowing channel (hereinafter, the Ethical Channel), in accordance with Directive 2019/1937 of the European Parliament, on the protection of persons who report breaches of Union law, and the draft bill transposing said Directive into national law, as well as international compliance-related best practices issued by the relevant bodies, which include: the Sarbanes Oxley Act; Recommendation number 42 of the CNMV's Good Governance Code for Listed Companies, revised in June 2020; UNE-ISO 19600 "Compliance Management Systems"; UNE-ISO 19601 "Criminal Compliance Management Systems".

In addition, this procedure details, among other things, the Group's compliance responsibilities relating to the handling of complaints received through the ethical channel and defines the various activities of the complaints management procedure.

Scope

This procedure shall apply to all compliance-related activities of Neinor Homes, S.A. and all its subsidiaries.

Modification

Modification or updating of this procedure must be approved by the Internal Information System Manager.

2. Duties

Detailed below are the various duties for ensuring compliance with the diligent and ethical behaviour required of the entire company in its work activities or in those that may have an impact on the company's reputational risk, always respecting the values and ethical conduct set out in the Neinor Homes Code of Ethics, as well as the associated internal regulations.

Board of Directors: the main body driving the implementation and maintenance of an ethical culture throughout the company.

Audit and Control Committee: to establish and supervise a mechanism that allows employees and other persons related to the Group (such as shareholders, directors, suppliers, contractors or subcontractors) to report, confidentially and anonymously, any potentially significant irregularities, including financial and accounting irregularities, that may come to their attention within the company, without any limitations on action on business or transactions contrary to our Code of Ethics and other compliance policies approved within the company.

Internal Information System Manager (System Manager): Responsible for the implementation of this mechanism for reporting potential irregularities, as well as for ensuring that the processing of the reports received is carried out diligently, confidentially and, where appropriate, anonymously when so requested by the whistleblower. He/she will be responsible for drawing up the present procedure for the management of communications and its updates.

Senior Management: to implement, safeguard and disseminate the highest ethical standards and compliance with the internal policies in place. To encourage the use of the Ethical Channel among employees.

GRC Management (Governance, Risks, Compliance, Sustainability and Audit): to carry out the investigation of reported events, and to oversee compliance and coordination of the whistle-blowing process. In addition, he/she will act as secretary of the Monitoring and Control Committee.

Employees: responsible for applying the company's ethical principles and values. Employees have a duty to report any potential irregularities detected, whether of a regulatory or ethical nature, including any possible actions contrary to the Group's ethical principles, as set out in the Code of Ethics.

3. Internal information system manager

The Board of Directors of Neinor Homes will be the body with the power to appoint, as well as to remove or dismiss, the System Manager, who may be a natural person, or a collegiate body which must delegate these functions to one of its members. Both appointment and removal must be notified to the Independent Authority for the Protection of the Whistleblower within 10 days.

On 10 May 2022, following approval by the Audit and Control Committee, the head of the GRC department was appointed, in his individual capacity, as System Manager.

The person responsible for the system will carry out his or her functions independently and autonomously from the rest of the company's bodies, and provisions will be made to avoid possible situations of conflict of interest.

4. Rights of the whistleblower and of the persons concerned

Whistleblowers will in all cases be guaranteed confidentiality and their identity will not be disclosed to any person other than an employee entrusted with receiving or following up complaints.

The whistleblower will have the right to be heard at any time, and to be informed of any actions taken or omissions attributed to him/her. To this end, a secure communication mailbox has been set up to communicate with the whistleblower, request additional information, or report on the course or outcome of the investigation.

The company will never retaliate, or take other actions constituting retaliation, such as threats or attempts at retaliation, against whistleblowers who send communications in good faith.

The persons concerned, i.e. those referred to in a communication, will have the right to the presumption of innocence and the right of defence, including the right to be heard and the right to access their file, as well as the same protection as that provided for whistleblowers, ensuring their confidentiality.

5. Accepted communications

Communications in relation to actions or situations that may involve a breach of the values set out in the company's Code of Ethics or in relation to alleged irregularities in legal or regulatory

matters detected within the company, such as those specified in Schedule I attached to this Procedure, will be accepted through the Ethical Channel.

In addition, company employees are given the possibility to report non-conformities relating to company protocols and procedures, such as incidents in procedures (due to lack of or outdated procedures), non-compliance with these protocols by personnel, or inefficiencies and bad practices in general.

Ordinary complaints in relation to the after-sales of homes will in general not be processed through the Ethical Channel, and must instead be processed through the channels set up by the company. This type of complaint will only be processed in cases in which a possible infringement of rules, negligence on the part of a company employee or significant harm to the inhabitants of the home or third parties is perceived.

Communications will not be admissible, and will be excluded from the protection specified, where:

- The facts described are inaccurate or misleading, or there is corroboration that the communication was made in bad faith, i.e. with the intention of harming the company or third parties related to the company.
- Communications cover interpersonal conflicts outside the work environment, which do not constitute a misdemeanour or infringement of rules.
- The information reported in the communication is already widely available to the public, or is based on mere hearsay.

6. Communications management procedure

[Access to the ethical channel or whistleblower mailbox](#)

Access to the Ethical Channel will be through the web address <https://neinorhomes.integrityline.com/frontpage>, where all interested parties will be able to send and manage their communications related to any potential irregularity or behaviour contrary to the law or to the company's Code of Ethics.

Alternatively, submissions may be made through a face-to-face meeting with the System Manager at the whistleblower's request. These meetings must be documented by a recording of the conversation or by detailed minutes of the meeting.

Sending communications

Once logged in to the Ethical Channel, the whistleblower will be able to select the type of communication he/she wishes to make, and will be asked to either enter his/her contact details or to send his/her communication anonymously. The whistleblower may also send his or her report by means of a sound recording, which will be received in a distorted form in order to safeguard anonymity.

Once the communication has been sent by the whistleblower, he/she will immediately receive an acknowledgement of receipt indicating its correct reception, together with the code to be used to access the secure communication mailbox, where he/she can be informed of the progress or results of the investigation being carried out, or, if necessary, additional information may be requested from him or her.

Anonymity

If the whistleblower wishes to send a communication anonymously, he/she will have to mark the box "I wish to remain anonymous", so that he/she does not have to enter his/her name or contact information.

If the communication is sent anonymously, the whistleblower will be required to create a password to access the Secure Communication Mailbox, in order to be able to communicate anonymously with the Ethical Channel managers.

Receipt and evaluation of the communication

Once the complaint is received through the ethical channel, the processing thereof will begin.

To do so, firstly, it will be categorised according to the type of communication and whether it is an admissible communication or, on the contrary, a different type of communication not managed through the Ethical Channel. In the latter case, the communication would be discarded, a reply sent to the whistleblower and it would be shelved.

In the case of a well-founded complaint about an alleged irregularity or non-compliance, the phase of analysis of the information and documentation provided, and subsequent investigation of the facts reported, by the GRC members authorised to deal with complaints will begin.

If it is detected that there could be a conflict of interest that would impede the independence in the management of the processing - for example, if the communication deals with

inappropriate behaviour of the manager or of one of the members of the GRC department, persons close to them, or their hierarchical superiors (such as the CEO or members of the Audit and Control Committee) - the analysis and investigation may be entrusted to an external expert in the matter, who will assume all the guarantees set out in this document.

In order to detect these potential conflicts of interest, all communications will be visible to at least two managers of the Ethical Channel, and it will be the obligation of all of them to communicate these cases to the management of the legal department in order to assess whether it is appropriate to hire an external expert, to continue with the investigation internally, or to pass the communication directly to the Audit and Control Committee, if the case represents a high risk of conflict of interest or leakage of privileged information.

On the other hand, communications on non-conformities in the company's procedures and protocols shall be sent to the Quality Manager for handling and response. However, if such a communication on non-conformities indicates a possible irregularity, this will be processed in the same way as the communications admitted on alleged irregularities.

If the communication is related to after-sales, depending on the nature of the communication, there are two possible courses of action:

- The communication refers to an ordinary after-sales complaint. It will be forwarded to the corresponding department in charge and will be considered concluded within the Ethical Channel, with a reply to the whistleblower.
- The report refers to a matter that may involve a potential irregularity, such as a health or safety problem for the inhabitants or an offence by an employee. In this case the report will be handled in the same way as a report of suspected irregularities.

Processing and investigation

The investigation and processing phase begins with a preliminary analysis of the communication by GRC Management, which will verify the plausibility of the reported facts.

Once admitted for processing, the persons under investigation may be informed of the existence of a communication concerning them and of its summarised content, unless it is considered that disclosure of the receipt of such a communication or subsequent initiation of an investigation could lead to the concealment, manipulation or destruction of evidence.

In the event that the person under investigation is informed, the right to be heard shall be respected at all times and he/she shall be allowed to state the facts he/she considers relevant

and to provide such evidence as may prove his/her innocence of the facts reported. Under no circumstances shall the persons under investigation be allowed to know the identity of the whistleblower, nor the full content of the communication or any other information that could reveal the identity of the whistleblower.

In the investigation process, those responsible for human resources and the legal department may be consulted in order to address any employment or legal implications that may arise from the reported facts.

The maximum duration of the investigation proceedings cannot exceed three months from the time of receipt of the notification, except in cases of particular complexity, in which case this period may be extended by up to a further three months.

Decision and communication

Once the investigation process has been completed, the final conclusions will be reflected in a report to be drawn up by the GRC Management. This report will reflect, among other aspects, the description of the complaint, data provided, work carried out, supporting documentation, assessment of the facts reported and proposed measures.

This analysis will be transferred, according to the decision of the GRC management, to the CEO or to the relevant part of Senior Management with responsibility for the matter, who will assess the facts reported and the measures proposed. The Audit and Compliance Committee will periodically receive details of the work carried out in this regard, including all communications received and admitted during the period and investigations carried out.

Once a decision has been reached, the parties involved will be informed of the conclusions of the investigation within a reasonable time, always abiding by the deadlines set out above.

In the event that the communication is rejected for any reason, such as lack of consistency in the facts reported or lack of materiality of the facts, the whistleblower and, if deemed necessary, the persons involved, will be informed of the rejection of this communication.

Disciplinary system

Section 4 of the company's Criminal Risk Prevention Manual details the disciplinary system to be adopted by the company in the event of possible breaches of the law or breaches of the company's Code of Ethics detected through the handling of communications received.

7. Data protection

In compliance with the provisions of the General Data Protection Regulation (hereinafter, GDPR), based on Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, and Organic Law 3/2018, of 5 December, on the Protection of Personal Data and Guarantee of Digital Rights (hereinafter, LOPDGDD), it is hereby communicated that the personal data that, where applicable, may be included in the complaint will be included in a file owned by Neinor Homes, S.A., which complies with the legal security measures.

The personal data processing will be considered lawful on the basis of the provisions of Article 6.1.c of EU Regulation 2016/679, 8 of Organic Law 3/2018 and 11 of Organic Law 7/2021, the data processing being necessary for compliance with a legal obligation applicable to the company.

The personal data processed will be kept in the system only for the time necessary to decide whether to open an investigation into the reported facts and, if so, for the duration of the investigation. In addition, data may be retained for the purpose of providing evidence of the functioning of the internal communication system.

Moreover, the data subject may exercise the rights of access, rectification, erasure (right to be forgotten), limitation of processing, data portability, opposition, the right to decide on automated processing, information and complaints, by communicating this through the company's data protection mailbox (lopd@neinorhomes.com).

The use of rights during the complaints handling process is detailed below:

- The right of access. The data subject will have the right to obtain from the Data Controller confirmation as to whether or not personal data relating to him/her are being processed and, if so, the right of access to his/her personal data.
- The right of rectification. The data subject will have the right to obtain, without undue delay, from the Data Controller the rectification of inaccurate personal data concerning him/her.
- The right to erasure (right to be forgotten). The data subject will have the right to have personal data concerning him/her deleted by the Data Controller.
- The right to restrict processing. This right implies a "flagging" of the personal data retained in order to restrict their processing in the future.

- The right to data portability. The data subject will have the right to receive from the Data Controller the data concerning him/her, in a structured, commonly used and machine-readable format, and to transfer them to another Data Controller without being prevented from doing so by the Data Controller to whom he/she has provided them.
- The right to object. The data subject may object to the processing of personal data concerning him/her by the Data Controller, including profiling. In the event that the data subject exercises the right to object, it will be presumed that there are compelling legitimate grounds for the processing of his or her personal data, unless there is evidence to the contrary.
- The right to decide on automated processing. The data subject will have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.
- The right to information. The data subject will have the right to know about the origin of any available information, the right to be informed of appropriate safeguards concerning the transfer of data to a third country or international organisation and the right to request and receive a copy of the personal data being processed.
- The right to complain. The data subject will have the right to lodge a complaint with a supervisory authority, and the right to judicial protection, in particular in the Member State of his/her habitual residence if he/she considers that his/her rights under the GDPR are infringed.

8. External channels of communication

Potential whistleblowers are informed of the possibility, as an alternative, of submitting their communication directly - or after sending the communication through the company's Ethical Channel - to the public authorities through the external communication channel set up by the Independent Whistleblower Protection Authority, in accordance with the terms established in Title III of the Law on the Protection of Whistleblowers, transposing Directive (EU) 2019/1937.

Annex I. Offences included in the Criminal Risk Prevention Manual

This list includes the criminal acts whose commission is prevented in the Criminal Risk Prevention Manual of Neinor Homes, detailing the risk associated with each of them and the rules of action required of any employee of the company.

It is presented as an attachment to the Ethical Channel Management Procedure in order to help informants to identify potential actions contrary to the law, as well as to help to know the type of crime that could be committed by the person being reported.

This list should in no case be understood as exclusive, and is not intended to include all the reasons for which a person may send a communication through the Ethics Channel. When in doubt, it is recommended to report any fact that is not considered acceptable or ethical, whether or not it appears below.

1. Planning crimes

In relation to this risk, the general principles of conduct that all personnel and the legal representatives of Neinor Homes must comply with will be, without prejudice to subsequent amendment, the following:

1. It is mandatory to accept and follow the procedures set up in order not to contravene planning rules.
2. It is prohibited to perform any works of construction, demolition, renovation, restoration etc. without having obtained the corresponding authorizations and licenses.

2. Bribery, influence peddling or economic malfeasance

In relation to this risk, the general principles of conduct that all personnel of Neinor Homes must comply with will be as follows:

1. The Personnel must abstain from offering or accepting gifts or presents exceeding the limits considered reasonable in corporate custom, as well as those that have a clear and evident purpose of corrupting the correct, impartial and objective pursuance of the function entrusted to a Public Official.
2. The Personnel who are going to have contact with the Public Administrations must be assigned in advance by their direct manager in order to act on behalf of Neinor Homes.
3. Personnel with management roles are expressly prohibited from assigning to personnel the management of the contact with the Public Administrations, wherever there is any kind of risk of conflict of interest.
4. Personnel are expressly prohibited from making payments in cash while such contact is taking place.
5. Personnel are not authorized to deliver any documentation to the Public Administrations without checking its accuracy.
6. Any person detecting the possibility of there being a conflict of interests in the framework of that person's contact with public officials or public administrations must

notify this to the person's Supervisor and the Control and Monitoring Committee or the Compliance Officer.

7. Personnel with contact with the Public Administrations must keep and retain the documentation exchanged, including the data and decisions taken. It is recommended that: (i) at least two people from Neinor Homes attend meetings with the Public Administrations and (ii) minutes are drawn up after meetings held with the Public Administrations.

3. Discovery and disclosure of business secrets

In relation to this risk, the general principles of conduct that all personnel of Neinor Homes must comply with will be as follows:

1. The use of confidential information from third companies in professional activities is prohibited. In the event of any doubt, the legal department must be consulted.
2. Duties of confidentiality derived from handling the information referred to will remain indefinitely, even when the connection of the personnel with Neinor Homes has ended.

4. Private corruption

In relation to this risk, the general principles of conduct that all the personnel of Neinor Homes must comply with will be, without prejudice to subsequent amendment, the following:

1. Personnel must refrain from offering or accepting presents or gifts that exceed the limits deemed reasonable in corporate custom, as well as when they have the clear and evident purpose of corrupting free competition between businesses.
2. Personnel are not authorized to receive any kind of remuneration from customers or providers, nor in general to accept any kind of remuneration from third parties for services derived from the employee's own activity.
3. The contracting of external services and supplies and relations with suppliers in general, including those referring to computer services and systems areas, must be done through transparent procedures that are in line with best competition and marketing criteria. Any commission, discount or commercial advantage offered must be rejected or must be reflected in a lower cost or greater income for Neinor Homes.
4. Personnel who receive or deliver, by themselves or for a family or friend, a courtesy gift or present with a significant value that exceeds corporate custom must make this known to their supervisor and the Monitoring Committee or Compliance Officer.
5. Personnel must avoid any kind of interference or influence by customers, providers or third parties, that might alter the impartiality and professional objectivity of the personnel, an obligation that specially affects personnel who have to take decisions on contracting supplies and services and those that decide the financial terms of transactions with customers.

5. Crimes against the environment

In relation to this risk, the general principles of conduct that all the personnel and legal representatives of Neinor Homes must comply with will be, without prejudice to subsequent amendment, the following:

1. All personnel are covered by the principle of protection of the natural environment and must ensure that no action of theirs may harm or cause damage to the environment.
2. Falsification or omission of information on any environmental aspect is prohibited.
3. Every subcontracted company must adhere to the values and principles of protection of the environment governing this area.

6. Crimes against family and personal privacy

In relation to this risk, the general principles of conduct that all personnel of Neinor Homes must comply with will be as follows:

1. Personnel are obligated to respect the family and personal privacy of all persons, whether personnel of the company or any other persons, the data of which they have access to. Such respect must cover those personal, medical, financial or any other kind of data that may in any way affect the private and personal sphere of the person they relate to.
2. It is obligatory for all authorizations of the use of data to be in response to specific requests, and that the data that are used are also specific.
3. Personnel must always be bound by the duty of secrecy in their contact with other customers and third parties, and with the other employees of Neinor Homes, except where there are professional reasons justifying the communication of the information within the limits set by law.
4. Confidentiality duties arising from the handling of the information referred to will remain in place indefinitely, even when the connection of the personnel with Neinor Homes has ended.

7. Computer crimes

In relation to this risk, the general principles of conduct that Neinor Homes personnel must comply with will be as follows:

1. Personnel must respect the specific regulations on the use of email, internet access or other similar possibilities made available to them and must under no circumstances make an inappropriate use of the same.
2. Personnel must not use the computer facilities made available to them by Neinor Homes for illicit purposes or for any other purpose that might harm the image or interests of Neinor Homes, of its customers or of third parties, affect the service and dedication of the employee or harm the functioning of the Company's computer resources.

3. Personnel are expressly prohibited from accessing applications or computer equipment of third parties without prior authorization.

8. Illegal immigration

In relation to this risk, the general principles of conduct that all Neinor Homes personnel must comply with will be as follows:

1. The construction of developments of Neinor Homes must not be contracted to companies that have been found guilty of crimes of illegal immigration or trafficking of persons.
2. Personnel of Neinor Homes will ensure the adequate legal situation of migrants in hiring processes.

9. Crimes against industrial and intellectual property

In relation to this risk, the general principles of conduct that all Neinor Homes personnel must comply with will be as follows:

1. Personnel must not install or use in the computer equipment of Neinor Homes, software licenses, programs or applications, the use of which is illegal or could damage the systems or harm the image or interests of the company, of customers or of third parties.
2. Personnel must in any event respect the industrial and intellectual property of third parties, and not use in any way any material that could infringe such rights.
3. Personnel are prohibited from using any kind of material (images, texts, drawings etc.) without prior evidence that Neinor Homes has acquired the corresponding rights and/or licenses. In particular, the use of images, texts and drawings in advertising and communication must be approved by the relevant department before it can be used.
4. Personnel is only authorized to use the material delivered by Neinor Homes to pursue their employment activity.

10. Fraud

In relation to this risk, the general principles of conduct that all Neinor Homes personnel must comply with will be as follows:

1. Personnel must comply with the principles of honesty, impartiality, respect, trust, and integrity, and are obligated to ensure that no action of theirs can be interpreted as fraud to the detriment of customers, providers or third parties.
2. Personnel must refrain from signing agreements through model contracts or clauses that are different from those authorized by Neinor Homes.
3. Personnel are not authorized to negotiate agreements or business in the name of Neinor Homes without previously having informed their hierarchical superior or the head of that area of the company.

11. Punishable insolvencies

In relation to this risk, the general principles of conduct that all Neinor Homes personnel must comply with will be, without prejudice to subsequent amendment, as follows:

1. Personnel are prohibited from disposing of, transferring, assigning, concealing etc. any asset owned by Neinor Homes (funds, real estate etc.) for the purpose of avoiding compliance with obligations to creditors thereof.
2. The relations of the Company and its personnel with media are reserved to the Marketing and Communication Areas.
3. Except for legal, administrative or judicial provision, the contribution, transmission or dissemination of information of this nature to any person without the authorization of their immediate hierarchical superior is prohibited.
4. The confidentiality duties derived from the handling of the referred information will remain indefinitely, even when the staff member's relationship with the Company has ended.
5. The use of any type of deception, threat, violence or use of privileged information or fraudulent means with the purpose of altering the prices of things that would result from the free concurrence of products is absolutely prohibited.

12. Alteration of raw materials and market prices

In relation to this risk, the general principles of conduct that all Neinor Homes personnel and legal representatives must comply with will be, without prejudice to subsequent amendment, as follows:

1. Dissemination of false information that may affect in some way the price or trading of any product is prohibited.
2. The relationship between the Company and its personnel with the media are restricted to the Marketing and Communication Department.
3. Unless imposed by law, the administration or the courts, it is prohibited for the personnel to provide, transfer or disseminate information of this kind to anyone without the authorization of their immediate hierarchical superior.
4. The confidentiality duties arising from the handling of the information referred to will remain in force indefinitely, even when the connection between the member of staff and the Company has ended.
5. The use of any kind of fraud, threat, violence or use of insider information or fraudulent means for the purpose of altering the prices of items that would have resulted from unrestricted market prices is absolutely prohibited.

13. Crimes against the Tax Authorities, the Social Security Authorities and subsidy fraud

In relation to this risk, the general principles of conduct that all Neinor Homes personnel must comply with will be as follows:

1. Falsification, concealing or simulating of accounting data, items and/or transactions, having a dual accounting system, invoices etc. that are for the purpose of the avoidance of payments, or obtaining of illicit benefits, to the detriment of the Tax Authorities, is prohibited.
2. Personnel must under all circumstances avoid the use of opaque structures for tax purposes, these being deemed structures in which, through the intervention of special purpose vehicles through tax havens or territories that do not cooperate with tax authorities, are designed for the purpose of preventing knowledge on the part of the authorities of the ultimate party responsible for the activities or the ultimate owner of the assets or rights involved.
3. The use of any financial product that might also involve the illicit avoidance of payments, or the obtaining of improper benefits, to the detriment of the Tax Authorities, on behalf of Neinor Homes, is prohibited. Personnel entrusted with accounting must keep and conserve all documentation used in the corresponding file in order to carry out their work.
4. Obtaining subsidies, tax deductions or aid from the Public Administrations by falsifying data or conditions of any kind to the benefit of the Company is prohibited.
5. No member of staff may falsify any data to favor or harm Neinor Homes. If such action is directly proposed by the public authority or official, it must be rejected and communicated to his/her Supervisor and to the Control and Monitoring Committee.

14. Crime of Money Laundering and Terrorism Financing

In relation to this risk, the general principles of behavior that must be complied with by all Neinor Homes staff are as follows:

1. Unlawful conduct is prohibited on its own account or in collaboration with a third party, favoring money laundering or terrorist financing.
2. The commercial managers must ensure the proper application of the due diligence of the sales operations of the company carried out by the commercial agents.
3. Cash payments made by customers are prohibited.
4. All staff are required to comply with all policies established in the company in the areas of money laundering and terrorist financing prevention, updated periodically through the different reviews and transferred in training courses.

15. Misleading advertising

In relation to this risk, the general principles of conduct that all Neinor Homes personnel must comply with will be as follows:

1. Commercial relationships with customers must be governed by criteria of the maximum quality and transparency of prices and other conditions. Customers will be duly informed of offers of products and services and risks of the same and any conduct in advertising, marketing and sales that might involve misinformation, a lack of relevant information, abuse or price-fixing will be avoided.
2. Personnel, when conducting the tasks assigned to them, must ensure the truthfulness of the characteristics and conditions of the products offered to the customers irrespective of the means by which these are carried out.

16. Illegal financing of political parties

In relation to this risk, the general principles of conduct that all Neinor Homes personnel must comply with will be as follows:

1. Any and all kinds of donations, gifts, privileges or presents to any and all political parties are prohibited.
2. Whoever, in the course of the appropriate tasks of his/her employment, receives a proposal from a politician to give especially favorable treatment, facilitate bureaucratic formalities, grant licenses or similar item, will be obligated to make this known to the Control and Monitoring Committee through the Reporting Channel.

17. Crimes against workers' rights

In relation to this risk, the general principles of conduct that all Neinor Homes personnel must comply with will be as follows:

1. Neinor Homes is committed to the strictest compliance with employment and social legislation.
2. The Human Resources Officer will ensure that employment conditions are in line with general law and specifically with employment law, including industry collective agreements.