

Code of Ethics

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Date of creation	24/07/2019
Date of review	012/12/20224

This section shall include the successive amendments made to the present Code.

1 Purpose and Management Statement

This document constitutes the Code of Ethics (hereinafter, the “Code” or “Code of Ethics”) of the group that integrate companies Coral Homes Holdco, S.L.U. (as parent company), Coral Homes S.L., Servihabitat Servicios Inmobiliarios, S.L.U. and Serviland Gestión Urbanística, S.L.U. (as subsidiary companies), (hereinafter and indistinctly, the “Group” or “Coral Homes Group”).

The Coral Homes Group carries out its activity on the basis of key principles and one clear premise: to be leaders in our sector and focus on people, while being strongly committed to our social, environmental and cultural surroundings.

Our Code of Ethics is a statement of basic principles, of our values and of our standards on ethics and integrity that govern our activity, and it brings all of us who form part of the Coral Homes Group together under a group of values that guide our [every day, everyday](#) decisions and actions.

The purpose of the Code of Ethics of the Coral Homes Group is to establish a catalogue of ethical principles, values and regulations of conduct, which must effectively guide the action of all the companies and people part of the aforementioned Group.

The present Code of Ethics defines the way in which we carry out business, describing the conduct which must be promoted and behaviours which must be avoided.

It constitutes the instrument of the highest level in our regulatory structure. Its principles are implemented in policies, regulations and procedures. It represents the commitment of the Coral Homes Group to obeying the laws and the ethical values defended in these laws.

All levels of the companies that integrate the Coral Homes Group shall ensure the real and effective application of these principles, in such a way that this system of self-regulation contributes to eliminate any act which may jeopardise the values and legal rights to be protected.

Failure to comply with this Code shall constitute an infringement, which shall be object of the appropriate sanction.

Considering that the link between the failure to comply with the ethical principles and conduct which is classed as a criminal offence in the Criminal Code and that the main hindrance to the effectiveness of a Code of Ethics is tolerating failure to comply with the aforementioned, Coral Homes Group lays down a zero-tolerance policy for all levels of its structure and maximum collaboration is requested in communication via the [Corporate Whistleblowing Channel](#) [Ethical Line and/or the Whistle-blowing Line](#), which [are-is](#) expanded on in section 7 of the present Code, regarding any risk situation detected.



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The present Code of Ethics includes a sanctioning system, which shall be applicable in the event of an infringement of the ethical principles contained in the aforementioned.

2 Scope of Application and Compliance

Our Code of Ethics is applicable to everybody who integrates the Coral Homes Group, employees, managers, representatives and members of the governing bodies of the companies that compose the aforementioned Group. These people receive a copy of the Code of Ethics upon joining the Group, the content of which they must read and accept.

All of the aforementioned people are responsible for complying with the Code of Ethics and for promoting the values and principles contained in it. The people in charge of each Area and Department of the companies that integrate the Coral Homes Group are committed to ensuring that the aforementioned Code is complied with and applied.

The employees, managers and members of the governing bodies of the companies that integrate the Coral Homes Group shall sign an annual statement of compliance with the Code of Ethics in which they state to have complied with the Code and undertake to continue with its compliance.

The scope of application of the Code of Ethics shall extend, insofar as possible, to the suppliers, agents and third parties which are related to the companies that integrate the Coral Homes Group in the carrying out of their activity, by incorporating clauses on knowledge and acceptance of the Code of Ethics of the Group into their contracts. Failure to comply with these clauses shall constitute a material breach of the contract.

The aforementioned people (hereinafter, the **“Regulated Persons”**) shall be under an obligation to know, comply with and collaborate when applying the present Code.

The Coral Homes Group encourages the Regulated Persons to [notify/consult](#), via the [channels/mailboxes](#) established in section 7-8 of this Code of Ethics ([cumplimientonormativo@servihabitat.com](#) and [compliance@coralh.com](#), the [Whistle-blowing Line of Coral Homes Holdeo, S.L.U.](#) and [Coral Homes, S.L.](#), and the [Ethical Line of Servihabitat Servicios Inmobiliarios, S.L.U.](#) and of [Seviland-Gestión Urbanística, S.L.U.](#)), [any situation in which they have doubts about whether their own actions or that of third parties could violate the ethical principles established in this document.](#)~~[any situation in which the aforementioned people have doubts on whether their own conduct or that of third parties might lead to an infringement of the ethical principles established in the present document.](#)~~

[Likewise, they are encouraged to communicate through the Corporate Whistleblowing Channel, any fact or action of which they become aware in the exercise of their functions that could lead to a potential breach of the internal regulations of the Coral Homes Group and/or of current legislation.](#)

2.1 Sensitive Positions

The behaviour of certain people, as a result of the position that they hold in the organisational structure of the Coral Homes Group, is particularly relevant in order to preserve the reputation of the aforementioned and of the integral companies and to ensure the compliance of their commitments.

These people are referred to in this Code as people with sensitive positions and this category includes the following:



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- The Management Team of the companies that integrate the Coral Homes Group (members of the governing bodies, Steering Committee of Servihabitat Servicios Inmobiliarios, S.L.U., Area Managers and Department Managers); and
- Any person who, at the discretion of the Compliance Committee of the Coral Homes Group (the “**Corporate Compliance Committee**”), carries out functions which exert a relevant influence on the way in which business takes place in the integral companies.

The people who hold the aforementioned positions must consider a series of conduct guidelines, in addition to those required for other employees, due to the influence that their actions may have on the reputation of the Coral Homes Group and of the integral companies.

2.2 Adherence Process

The Code must generally be adhered to:

- In the case of members of the Management Team and other employees, upon their approval or when joining the companies that integrate the Coral Homes Group by signing and accepting the aforementioned.
- For labour relations and commercial relations already established upon approval and entry into force of the Code, the Personnel Department of Servihabitat Servicios Inmobiliarios, S.L.U. and Serviland Gestión Urbanística, S.L.U. (Human Resources) shall be responsible for matters regarding labour relations, and the Procurement Department shall be responsible for commercial relations, and the Compliance area of Coral Homes Holdco, S.L.U., in accordance with the appropriate company, shall be responsible for obtaining, by means of a procedure which guarantees its effectiveness, the relevant adhesion in a maximum period of one (1) month from its effective approval.
- The suppliers or third parties with which relations are held in the future shall adhere to the Code of Ethics at the beginning of the relations or, where appropriate, upon their acceptance in the supplier approval process. As an exception and with authorisation from the Chief Compliance Officer of the relevant company belonging to the Coral Homes Group, it may be decided to approve the Code of Ethics of the supplier or third party in question and the adhesion process for its employees to the aforementioned, verifying that this includes the fundamental principles and standards of the Coral Homes Group.

2.3 Responsibilities of the Regulated Persons

In order for the activity of the Coral Homes Group to be carried out well, the Regulated Persons must act with professional due diligence while performing their functions and the aforementioned must assume the obligation to familiarize themselves with and understand the implications of this Code, which they individually undertake to comply with.

The Regulated Persons also make the following commitments:

- To state, via the channels established in section 7 of this Code of Ethics, any situations which, even if they are not related to actions which have taken place in their professional environment, may imply a failure to



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comply with the stipulations of this Code and, in particular, when the situation in question results in a risk of failure to comply with any of the legal or contractual obligations to which the companies that are part of the Coral Homes Group are subject.

- Provide the Compliance area of the relevant company belonging to the Coral Homes Group with the necessary information so that the aforementioned Department can verify compliance with the Code. The Regulated Persons belonging to Serviland Gestión Urbanística, S.L.U. will provide the aforementioned information to the Compliance area of Servihabitat Servicios Inmobiliarios, S.L.U.
- Inform the Compliance area and the Legal Department of the relevant company part of the Coral Homes Group of the existence of any criminal legal proceedings in which the Person appears investigated, accused or convicted, which may affect its performance, the reputation of the companies that integrate the Coral Homes Group and the Group itself, or when this deals with events related to activities which are also carried out by the companies that integrate the Coral Homes Group. This duty of notification extends to the sanctioning administrative proceedings processed by supervisory bodies of the activity of these companies that may be involved.
- The Regulated Persons are obliged to actively and diligently collaborate with the companies that are part of the Coral Homes Group, in accordance with the instructions received from the Legal Department of the relevant company which is part of the Coral Homes Group, in defence of the interests of the aforementioned Companies in light of any judicial, arbitral and/or administrative proceedings. It shall be mandatory to appear before judicial, governing and/or arbitral bodies when a direct summons is received from the aforementioned bodies, whether in the personal or professional residence. In addition, these companies must be collaborated with when requested in order to prepare and/or attend an appearance or statement in any process.

The Coral Homes Group has a disciplinary system in line with the current labour legislation, which takes shape as a fundamental tool to protect internal policies and procedures. Failure to comply with the Code of Ethics, the Criminal Compliance Management System and/or the Manual on Prevention of Money Laundering and Financing of Terrorism, shall be considered a very serious offence for the purpose of the application of the appropriate disciplinary measures, and, therefore, may give rise to disciplinary sanctions, including, where applicable, the termination of the corresponding labour or commercial relations. This internal sanctioning procedure shall be in addition to the external legal liabilities to which, as a result of his/her actions, the employee may be subjected.

3 Our Principles and Values

The Coral Homes Group is committed to the following principles and values that form the basis of the present Code of Ethics, and it shall implement any necessary internal policies and procedures in order to comply with the aforementioned Code.

3.1 Principles of Transparency and Anti-corruption Regulations

“By being honest and transparent we build trust, which is a core value for the Coral Homes Group”



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The trust of its shareholders, clients and, in general, the environment where it operates are the foundations upon which the business activity of the Coral Homes Group is built. Trust can only be earned if the integrity of the Group is beyond question.

For this reason, its relations are based on principles of transparency and equal opportunities, and it rejects any action aimed at getting an advantage over rivals, on the market or in the government or private contracts which are based on an unlawful act.

The Coral Homes Group enforces the “zero-tolerance” principle with regard to corruption. Therefore, together with the present Code, the Coral Homes Group approves its Anti-corruption and Fraud Prevention Policy.

Influence peddling shall be considered as any act or strategy which aims to direct or influence the action of a civil servant or authority, taking advantage of any situation derived from its personal relationship with the aforementioned or with another civil servant or authority to obtain a solution which may directly or indirectly generate an economic benefit or prevent the company itself or a third party from making any kind of loss.

As a result, any person belonging to the Coral Homes Group must not, while carrying out his/her professional activity, directly or indirectly offer or award anyone in public office, civil servants or managers of private companies presents, rewards, commission, gifts or other unauthorised advantages, whether in cash or in the form of other benefits, or in any way influence civil servants, taking advantage of any situation derived from the personal relationship with the aforementioned, in order to obtain preferential treatment in the awarding of contracts or of any other professional services, or personal benefits or advantages in favour of the companies that integrate the Coral Homes Group.

No person belonging to the Coral Homes Group must use his/her professional position to demand, accept, obtain or be promised preferential treatment, advantages, loans, commission or bribes from third parties. As an exception, presents and gifts may be delivered and accepted if the requirements and the procedure included in the Anti-corruption and Fraud Prevention Policy of the Group are complied with. The aim of the aforementioned Policy is to create an environment in which the risks of fraud are minimised.

The Coral Homes Group has a *Compliance Policy* which includes the commitments made by the companies that form part of the aforementioned Group, as regards Compliance, and it has an *Anti-corruption and Fraud Prevention Policy*, the aim of which is to create an environment in which the risks of fraud are minimised. In addition, the Coral Homes Group provides all employees with the tools required to settle any doubts that may be set out in relation to the Anti-corruption and Fraud Prevention Policy (via the mailboxes of the Compliance areas of the companies that integrate the Coral Homes Group: cumplimentonormativo@servihabitat.com for Servihabitat Servicios Inmobiliarios, S.L.U. and Serviland Gestión Urbanística, S.L.U. and compliance@coralh.com for Coral Homes, S.L. and Coral Homes Holco, S.L.U.) as well as to report any possible cases of failure to comply with the aforementioned Policy via the channels established in section 7 of this Code of Ethics.

The companies that integrate the Coral Homes Group may have a relationship with political parties within the framework established in the legal system and in compliance at all times with the national laws as regards political party funding.

Donations may not be made to political parties or to foundations linked to the aforementioned.



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Situations of conflict are described as situations in which the interest of a client or possible client comes into conflict with the interest of another client and/or the interest of the companies that integrate the Coral Homes Group, and, as a result, there is a material risk that the interest of one or more clients is affected.

At all levels of the companies that integrate the Coral Homes Group there shall be a duty to avoid situations of conflict of interest.

Conflict which may be generated among the interests of employees, managers, members of the governing bodies and shareholders and the interests of our clients or those of the Coral Homes Group must be avoided. Conflict of interest which may be generated among our clients must also be avoided.

Thus, everybody who integrates the Coral Homes Group shall act while placing the interests of the aforementioned Group and its clients before their own interests, those of their relatives or those of other people linked to them.

In addition, any potential conflict of interest which may be caused within the companies that integrate the Coral Homes Group must be notified.

In order to identify the types of conflict of interest that may arise in the rendering of services, whose existence may damage the interests of a client, it must at least be taken into account whether the integral company of the Coral Homes Group, a “competent person” member of the governing bodies, shareholder, manager or employee of the aforementioned company or a person directly or indirectly linked to it through a management or outsourcing relation, is in any of the following situations:

1. The integral company of the Coral Homes Group or the person considered may make a financial benefit or avoid a financial loss, at the expense of the client.
2. The integral company of the Coral Homes Group or the person considered has an interest in the result of a service rendered to the client or of a deal made on behalf of the client which is different from the interest that the client has in the result.
3. The integral company of the Coral Homes Group or the person considered has financial incentives or incentives of another kind to favour the interest of another client or group of clients to the interests of the client.
4. The integral company of the Coral Homes Group or the person considered carries out the same activity as the client.
5. The integral company of the Coral Homes Group or the person considered receives or will receive an incentive from a person who is not the client with regard to a service rendered to the client, in the form of money, goods or services, other than the usual commission or payment for this service.



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3.2 Prevention of Money Laundering and Financing of Terrorism

“Respecting the laws and other regulations in force at all times must be a guiding principle of all members of the Coral Homes Group”

The fight against money laundering and financing of terrorism, referred to by the recommendations of the Financial Action Task Force (FATF) and the regulations derived from them, as well as a legal obligation, are a priority for the Coral Homes Group, with Coral Homes, S.L., Servi habitat Servicios Inmobiliarios, S.L.U. and Serviland Gestión Urbanística, S.L.U. being liable parties.

The Coral Homes Group or any of the people it employs or collaborators must not carry out or be involved in any activities which implicate money laundering and/or terrorism, in any shape or form. The Coral Homes Group complies with the laws against money laundering and fully cooperates with the authorities responsible for fighting against money laundering or the financing of any unlawful activity.

In order to guarantee compliance with the laws and regulations against money laundering, the Coral Homes Group has a Manual on Prevention of Money Laundering and Financing of Terrorism, and bodies responsible for ensuring that the aforementioned is complied with. All employees, shareholders, managers and collaborators must know the applicable internal regulations as regards prevention of money laundering, which are issued among them.

Any suspected situation of risk in this regard must be notified immediately via the channels established in section 7 of this Code of Ethics.

3.3 Protecting Free Competition. Market Regulation and Consumers

“The Coral Homes Group believes in free, honest and fair competition”

The companies that integrate the Coral Homes Group operate in the market while observing the principles of free competition and equal opportunities, and reject any action aimed at getting an unfair or unlawful benefit, use or advantage over clients, suppliers, rivals and other market participants.

Employees and collaborators that carry out marketing tasks must not, under any circumstances, jeopardise the quality of products and services and must carry out marketing in a responsible and transparent way.

Clients must be dealt with ethically, equally and, in any case, in compliance with the legislation in force at all times.

The suppliers of the Coral Homes Group must likewise comply with and observe the ethical principles and standards included in the present Code.



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As a result, the following acts or conduct, inter alia, shall not be considered ethical and shall therefore be banned:

1. Unauthorised access to confidential information of other companies.
2. Industrial espionage.
3. Disclosure of trade secrets.
4. Use of privileged information belonging to the Coral Homes Group or to third parties for any type of transaction or deal.
5. Acts aimed at creating false advertising.
6. Any type of deception, fraud or trick.
7. Spreading of false rumours about products, services, market conditions, etc.
8. Manoeuvres to modify the price of products belonging to third parties.
9. Manoeuvres to modify the contribution or the value of a company.
10. Manipulation of public tenders.
11. Falsification of payment methods.
12. Manoeuvres to lead the company into a situation of insolvency in order to defraud creditors.

In relation to these activities, particular attention shall be paid, inter alia, to the following conduct which is not permitted:

1. Access data, technical information on products or business strategies of a competitor through a common supplier, a relative, a trusted contact, or research which goes beyond any information that may be considered to be public.
2. Give false advice or make false promises to a client or to the market regarding the qualities or characteristics of a product belonging to the Coral Homes Group or to the rival.
3. Falsify economic and financial information of the company and particularly annual accounts.
4. Spread rumours on social media, via means of communication or directly to clients, about a rival, its products and services, or about any other company.
5. Use the confidential information which has been accessed due to the position held or the work carried out in the company in order to transfer it to third parties, sell it or use it to acquire or sell shares, or for any other transaction or deal.
6. Carry out any kind of unfair action which places the companies that integrate the Coral Homes Group or the Group itself in an advantageous position in the market.

3.4 Equal Rights and Principle of Non-discrimination

“We respect people, their dignity and core values”

As a core value of its activity, the Coral Homes Group undertakes to respect people and their dignity, and endorses the Universal Declaration of Human Rights adopted by the United Nations in 1948 and the documents that derive from the aforementioned, particularly the International Covenant on Civil and Political Rights of 1966, the International Covenant on Economic, Social and Cultural Rights of 1966, as well as the Convention for the Protection of Human Rights and Fundamental Freedoms of 1950. It also accepts and observes the principle of union representation of its employees.



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Every person included in the scope of application of the present Code of Ethics must observe the dignity of our clients, employees, shareholders, governing bodies, suppliers and, in general, any natural person or legal entity that holds relations with the companies that integrate the Coral Homes Group.

The commitment of the Coral Homes Group is based on encouraging equal opportunities, to access our companies, to promote professionally within this Group as well as to collaborate with it. Thus, the Coral Homes Group prohibits any kind of discrimination, harassment, abuse or inappropriate behaviour due to gender, race, skin colour, nationality, creed, religion, political opinion, affiliation, age, sexual orientation, marital status, handicap, disability and other situations protected by law, with respect to our clients, employees, shareholders, governing bodies, suppliers and, in general, any natural person or legal entity that holds relations with the companies that integrate the Coral Homes Group.

The employees of the Coral Homes Group are selected and promoted in accordance with their abilities, training, knowledge, experience, leadership, diversity of thought, personal ambitions and future potential. The objectivity of these decisions may not be influenced or affected by any other factor. Meritocracy is the basic principle when it comes to attracting, retaining, recruiting and developing talent.

A basic operating principle at the Coral Homes Group is to provide the same opportunities to access employment and for professional promotion, at all times ensuring zero discrimination due to gender or sexual orientation, race, religion, background, marital status, age or social position. Therefore, everyone taking part in recruitment, selection and/or professional promotion processes shall be objective in their actions and decisions, with an open attitude to diversity and they shall aim to identify the most appropriate people for the profile and requirements of the position to be filled, promoting equal opportunities, diversity and meritocracy at all times.

The Coral Homes Group undertakes to maintain a work environment free from harassment, intimidation and offensive or improper conduct, including sexual advances or suggestions, graphic material and other actions which may offend the dignity of other people.

The Coral Homes Group promotes a balance between the demands of family life and those of work for the people who integrate the aforementioned Group, as well as gender equality among employees, in accordance with the laws.

All levels of the companies that integrate the Coral Homes Group ensure that this principle is observed, and the Regulated Persons are liable for preventing the conduct listed above from taking place, and, where appropriate, for internally notify of this conduct via the channels established for this purpose.

Within its commitment in this scope, Servihabitat Servicios Inmobiliarios, S.L.U. has approved an Equality Plan and a Prevention and Action Protocol against harassment.



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3.5 Occupational Health and Safety

“The Coral Homes Group recognises and guarantees the appropriate hygiene and safety measures”

The Coral Homes Group recognises and guarantees, through the prevention systems which have been legally established, health and safety in the workplace as a fundamental right of the people employed by the company.

All work to be carried out in the companies that integrate the Coral Homes Group must comply with the safety conditions demanded by the occupational risk prevention regulations, and the same principle is required of the suppliers that render services to these companies.

Through the application and compliance of the regulations as regards Occupational Health and Safety, as well as the implementation of prevention, training and information programmes, our commitment is focused on eliminating risks.

3.6 Workers' Rights

“The Coral Homes Group respects the individual rights of each person who forms part of it”

Under no circumstances shall working conditions or Social Security conditions which harm, cancel or restrict the rights that workers have, as recognised by legal provisions, collective bargaining agreements or individual contracts, be imposed in the Coral Homes Group.

Likewise, workers shall not be hired without notifying their registration in the appropriate Social Security Scheme.

With regard to foreign workers, they shall not be hired until the appropriate work permit has been obtained. In addition, contract or placement simulation techniques shall not be used under any circumstances.

In no event shall misleading or false working conditions be offered to either current employees or to anyone taking part in selection processes.

As an extension of the freedom of thought, expression and assembly, the Coral Homes Group undertakes to preserve the right to freedom to form and join trade unions, the right to strike and collective bargaining of its employees, while respecting their free disposal to formalise permanent non-profit groups which are aimed at achieving specific goals, always under current legislation.

The same principle is required of the suppliers that render services to the companies that integrate the Coral Homes Group.



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3.7 Respecting the Treasury and Social Security

“Respecting the laws and other regulations in force at all times is a guiding principle of all members of the Coral Homes Group”

The companies that integrate the Coral Homes Group punctually fulfil their fiscal and Social Security obligations.

The accounting of these companies and that of the Coral Homes Group faithfully reflect the economic situation of the aforementioned, including all income and expenditure made. No manoeuvre designed to hide income or profit shall be accepted.

All levels of the companies that integrate the Coral Homes Group shall be alert to any client or supplier that attempts to use the structure of the company for a fraudulent operation against the Treasury and Social Security.

3.8 Respecting Town Planning

“Respecting the laws and other regulations in force at all times is a guiding principle of all members of the Coral Homes Group”

The Coral Homes Group bases its activity on the management and maintenance of real estate assets, as well as on its initiatives of construction, building and development with respect to town planning and to the central, regional and local regulations by which it is governed.

Therefore, the Coral Homes Group shall not carry out any development, construction or building work which may not be authorised on land set aside for roads, green areas, public property or places whose landscape, ecological, artistic, historic or cultural value is recognised, through law or administration, or which have been considered to be under special protection for the aforementioned reasons.

In addition, the Coral Homes Group shall not promote the reassessment of land or the alteration of documents as regards planning, development projects, division of land into plots, redivision of land into plots, construction or building or the granting of licences, contrary to the regulations of land-use or urban planning in force.

3.9 Respecting the Environment, Collective Security and Public Health

“The Coral Homes Group shows its strongest commitment to protecting the environment”

At the heart of its activity, the Coral Homes Group undertakes to respect the environment and to preserve and protect it, while respecting the legislation in force in this regard, introducing procedures to reduce the environmental impact while carrying out its activities.

All levels of the companies that integrate the Coral Homes Group shall ensure resources are used reasonably, the environment is respected as well as backing sustainability.

The Coral Homes Group shall establish inspections on any activity which may directly or indirectly create a risk to collective security and public health, for which Servihabitat Servicios Inmobiliarios, S.L.U. has approved the *Quality and Environmental Management Policy*.



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Within the commitment of the Coral Homes Group in this scope, Servihabitat Servicios Inmobiliarios, S.L.U. is certified by ISO 14001 on Environmental Management.

3.10. Right to Privacy. Professional Secrecy, Confidentiality and Data Protection

“We maintain the confidentiality of the information we are entrusted with by our shareholders and clients”

The Coral Homes Group respects and protects the privacy of any person who, in their relations with the aforementioned Group, provides it with personal data or confidential information.

The confidentiality of information relating to our clients, employees, members of the governing bodies, shareholders and suppliers represents the cornerstone laid down by the relationship of trust, which is at the core of our activity.

Everybody who integrates the Coral Homes Group shall respect the data protection regulations and shall strictly keep in secret any data they know due to their professional activity.

Internal regulations on processing of personal data and data confidentiality, as well as legislation in force as regards data protection must be respected at all times.

The companies that integrate the Coral Homes Group are under an obligation to protect the personal information of clients to which it has access through rendering services, which brings them together. Likewise, the aforementioned are under an obligation to protect the personal information and/or confidential information of their employees, members of their governing bodies or of any natural person or legal entity with which it has relations. It must be presumed that all information received is confidential. The Coral Homes Group contractually demands third-party supplier companies with which it has relations to keep the information confidential and to implement the appropriate security measures with respect to any data to which they may have access upon rendering services.

The information received may only be processed for the purpose for which it was transmitted and/or gathered. Before transmitting information to third parties, we must ensure that we are authorised to do so.

Any employees and suppliers that access personal data must process the aforementioned in accordance with that stated in this Code of Ethics and with the regulations in force.

Measures shall be implemented in marketing campaigns which guarantee that data is obtained correctly, with mandatory consent and the information required so that the interested party knows the scope and the purpose of the processing of its data.

The Coral Homes Group carries out evaluations on the channels through which personal data is obtained and the aforementioned assures that all the requirements needed to comply with the applicable regulations are fulfilled.

Communication made via the [Corporate Whistleblowing Channel](#), [Ethical Line](#) and the [Whistle-blowing Line](#), included in section 7 of the present Code, is protected by a duty of secrecy of the people who manage the aforementioned [ChannelLines](#).



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The use of information of the Coral Homes Group shall be exclusively professional and it may not be used for personal purposes.

3.11. Industrial and Intellectual Property Rights

“The Coral Homes Group creates, innovates and firmly respects the creations of third parties”

The Coral Homes Group bases its policy to create intangible assets on the promotion of creativity and innovation.

The copy or total or partial reproduction of intangible assets of third parties, and the transformation, total or partial modification, importation or distribution of the aforementioned assets shall only be permitted upon due authorisation beforehand in writing.

The category of assets protected by intellectual property shall include books, videos, pieces of music, fonts, advertising campaigns, slogans, brochures, catalogues, documents, speeches, presentations, reports, studies, drawings, graphs, paintings, comics, projects, plans, maps, models, architectural or engineering designs, computer programs and any other protected work, even if the copyright or rights reserved symbol does not appear.

All programs installed on the computers and mobile devices of the companies that integrate the Coral Homes Group must have the appropriate user licence.

Brands, patents, industrial designs, domain names and other intangible assets protected by industrial property shall be protected in the same way.

3.12. Principle of Cyber Security

“The Coral Homes Group believes in implementing relevant security measures in order to guarantee the integrity and confidentiality of information”

All levels of the companies that integrate the Coral Homes Group shall ensure the prevention and control of criminal offences which may be committed through the use of information technologies.

The following stand out among the aforementioned offences, which constitute banned acts:

1. Unauthorised access to computer systems of competitors, clients, or any other public or private company or organisation.
2. Spreading of viruses or programs which may cause damage to tangible or intangible assets.
3. Denial-of-service attacks.
4. Manipulation of online auctions.
5. Any other type of computer damage, including sabotages or the simple modification of data or information contained in the computer system of a third party.
6. Online deceptions, including phishing, pharming and any other type of trick based on the use of information technologies or on social engineering.
7. Spreading of rumours, criticisms and boycotts on the internet and on social media, including retweets and forwarding messages of any kind.



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8. Carrying out misleading advertising campaigns and promotions.
9. Offence against the intellectual or industrial property of technology assets.
10. Industrial espionage on the internet.
11. Revealing and disclosing trade secrets obtained on the internet.
12. Unauthorised transfer of databases.
13. Unauthorised obtaining or transfer of confidential personal data.
14. Researching people on social media, violating their privacy.
15. The registration of domains using brands and corporate names of third parties.
16. Money laundering through electronic transfers or self-use.
17. Child pornography.

The Coral Homes Group has regulations which standardise the functions and responsibilities of staff with regard to the use of corporate resources.

4 Excellence and Professionalism

“At Coral Homes Group we work thoroughly and effectively. Excellence represents one of the core values of the companies that integrate our Group. Therefore, our professional activity is centred around the satisfaction of our clients and shareholders.”

4.1 Client Service

The Coral Homes Group centres its activity around clients. Through this commitment, the companies that integrate the Group create value for their clients and for the environment in which they operate.

In all relations with clients, the companies that integrate the Coral Homes Group undertake to keep a firm commitment to honesty and professional liability.

The services and products that the Coral Homes Group offers its clients have been placed on the market after the aforementioned have been thoroughly studied. These services and products must be marketed in accordance with the regulations and conditions established. Any complaint must be addressed quickly and seriously. In this respect, the Coral Homes Group has procedures established to settle any divergence. In this event, the Coral Homes Group acts honestly and reasonably and aims to solve problems quickly and effectively.



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4.2 Commitment to Shareholders

The Coral Homes Group follows the highest standards and best practices as regards corporate governance, stating to comply with the recommendations of good governance.

The transparency regarding its shareholders, the thoroughness in its investments, the reliable and professional way in which the Coral Homes Group works every day makes it possible to constantly analyse and study new business opportunities and add value to them.

4.3 Professionalism and Teamwork

The main asset of the Coral Homes Group are the people who are part of it and the values and principles that motivate them. The Coral Homes Group values the abilities and efforts of everyone.

As a team, the Coral Homes Group is driven by a sense of dedication and desire for excellence.

5 Actions of Employees or Collaborators Leaving the Coral Homes Group and Subsisting Obligations

In the event of termination of the labour or commercial relation existing between the employees and/or collaborators and the companies that integrate the Coral Homes Group, irrespective of the reason for this termination, all work materials, resources and equipment of the aforementioned companies that the employee and/or collaborator directly or indirectly has in its possession, at this time, as well as any documents, files and reports (irrespective of their format) belonging to the aforementioned companies and of which the employee and/or collaborator may have the original or a copy, shall be delivered to the immediate superior. For collaborators, these shall be delivered to the person responsible for hiring them, and the employee and/or collaborator shall have no right to withhold the aforementioned work materials, resources or equipment whatsoever. In particular, the employee and/or collaborator shall not keep any copy whatsoever, and must destroy all documents it has not returned, and especially documents containing sensitive information.

The employees and/or collaborators accept that the result of any work carried out for the companies that integrate the Coral Homes Group, whether intellectual property is considered or not, exclusively belongs to the aforementioned companies. As a result, the former employee or former collaborator may not copy, reproduce or pass on any element of these companies (including, by way of example but not limited to studies, proposals, programs, lists or inventories of any kind).

In addition, if the employee and/or collaborator has been granted powers by the companies that integrate the Coral Homes Group, upon request of the relevant company, the employee and/or collaborator shall immediately comply with the appropriate procedures so that the aforementioned powers are revoked and rendered void. In any case, if for any reason these powers were to remain in force despite the termination of the labour and/or contractual relation, the former employee or former collaborator shall in no way make use of them, and must notify third parties that he/she no longer holds the position of representative of the companies that integrate the Coral Homes Group. Any misuse or improper use of the aforementioned powers shall be object of the appropriate legal action on the part of these companies, even under criminal provisions when the action is shown to be criminal.



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The former employee or former collaborator shall remain bound by its loyalty to the Coral Homes Group, and in particular by its obligation to not disclose any sensitive and confidential information which is known as a result of carrying out its labour or commercial activity on behalf of the companies that integrate the Coral Homes Group and to keep this information in professional secrecy.

Lastly, if the former employee or former collaborator and the companies that integrate the Coral Homes Group agreed to a post-contractual non-compete agreement in the employment contract or in the commercial contract, where appropriate, or in any agreement attached to the aforementioned, the former employee or former collaborator must comply in accordance with the terms contained in this agreement. Any failure to comply with the aforementioned commitment shall grant these companies the right to proceed to demand the repayment from the former employee or former collaborator for the amounts which the aforementioned may have received under this concept, as well as to demand possible damages from the former employee or former collaborator which have been generated as a result of the recurrent conduct of the aforementioned.

6 Criminal Compliance Management System

The Coral Homes Group makes every effort to prevent the commission of criminal offences to which the Group is exposed while carrying out its activities.

The Regulated Persons must comply with that contained in the *Corporate Compliance Policy* of the Coral Homes Group and in the appropriate *Criminal Compliance Management Systems*, whether belonging to Servihabitat Servicios Inmobiliarios, S.L.U. and Serviland Gestión Urbanística, S.L.U. or Coral Homes Holdco, S.L.U. and Coral Homes, S.L., which include all criminal risks to which they are subject, in accordance with that stipulated in article 31 bis of the Criminal Code.

The Criminal Compliance Management Systems also include all relevant aspects which demonstrate that there is an organisational and management model with the suitable surveillance and control measures to prevent and, where appropriate, to detect the occurrence of criminal offences within the Coral Homes Group.

Furthermore, the control structure is completed through various audits performed by Internal Audits, in addition to audits or inspections carried out regularly by external experts.

All levels of the companies that integrate the Coral Homes Group must ensure the real and effective application of the prevention and control measures stipulated in the aforementioned Management Systems, in such a way that this system of self-regulation manages to eliminate any conduct which may jeopardise the market reputation and the tangible and intangible assets of the Coral Homes Group and its members.

The Criminal Compliance Management Systems shall be adapted to any trends in case law and any modifications undergone by the Criminal Code in relation to the criteria for accusation and the prevention and control requirements demanded as regards criminal liability of the legal entities, and the aforementioned Systems shall be updated regularly.



7 ~~Whistle-blowing Line and/or Communication~~ Corporate Whistleblowing Channel

Every person belonging to the Coral Homes Group is under an obligation to inform the companies that integrate the aforementioned Group of any fact or conduct that may entail a real or potential breach of regulations, both internal and external, and that may constitute crimes, administrative or labour infractions, any situation or conduct which infringes the ethical principles of this Code, the regulations or legislation in force, as well as any potentially significant irregularities.

To this end, ~~Grupo~~ Coral Homes Group has a Corporate Whistleblowing Channel as a means of communication of the aforementioned facts or conduct.

The employees, directors, members of the administrative bodies, suppliers and customers of Servihabitat Servicios Inmobiliarios, S.L.U. and Serviland Gestión Urbanística, S.L.U will be able to access the Corporate Whistleblowing Channel through the following link: <https://servihabitat.integrityline.com/>, and those of Coral Homes Holdco, S.L.U. and Coral Homes, S.L., through the following link: <https://coralhomes.integrityline.com/>.

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The management of reports filed through the Corporate Whistleblowing Channel will be carried out on the basis of the principles and procedures included in its Regulation. Thus, Servihabitat Servicios Inmobiliarios, S.L.U. has an Ethical Line as a means to notify of any activity which does not comply with the ethical principles of the Coral Homes Group or any circumstance which may bring about a criminal risk for the company or weaknesses in the Criminal Compliance Management System in order to address any complaint lodged for this purpose.

The Ethical Line is supported by a web application <https://lineaeticaservihabitat.i2ethics.com>, which may be accessed by employees, shareholders, managers, members of the governing bodies, suppliers, clients and, in general, any third party that wishes to notify Servihabitat Servicios Inmobiliarios, S.L.U. of any irregularity which may fail to comply with the ethical principles included in the present Code.

In turn, Coral Homes Holdco, S.L.U., Coral Homes, S.L. and Serviland Gestión Urbanística, S.L.U. have their own Whistle-blowing Line (compliance@coralh.com, for the first two and compliance@servilandgu.es, for the last one), via which the aforementioned groups may notify these companies of any irregularity, which may be liable to constitute an offence or not, or which contravenes the principles included in the present Code, or in any other internal regulations of the companies or of the Coral Homes Group.

In order to ensure the functioning of the *Criminal Compliance Management Systems*, the Code of Ethics, as well as the ~~Corporate Whistleblowing Channel~~ Ethical Lines itself and the Whistle-blowing Line, the Coral Homes Group has the Corporate Compliance Committee.

No company belonging to the Coral Homes Group or any member of the aforementioned companies shall make any kind of retaliation, discrimination or take any disciplinary measure against whistle-blowers who communicate in good faith and based on prima facie evidence.

8 Compliance Mailboxes

The Coral Homes Group has a Compliance mailbox for each of the companies that belong to it (for Servihabitat Servicios Inmobiliarios, S.L.U. and Serviland Gestión Urbanística, S.L.U., cumplimentonormativo@servihabitat.com



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and for Coral Homes Holdco, S.L.U. and Coral Homes, S.L., compliance@coralh.com) to which any query or concern related to the ethical principles of this Code, the regulations or legislation in force, as well as the *Criminal Compliance Management Systems* must be addressed.

9 Sanctions and Sanctioning Procedure

The failure of an employee of the Coral Homes Group to comply with the legislation in force at all times, with the Code of Ethics or with the regulations that implement the aforementioned shall constitute an infringement, whose grading and sanctioning shall take place in accordance with that stipulated in the Collective Bargaining Agreement and which is applicable to each of the companies that is part of the aforementioned.

The sanctioning procedure shall begin following a complaint, a notification, due to an investigation or as a result of any other form which allows the Corporate Compliance Committee to be made aware of the alleged infringement.

If the infringement were to be committed by somebody holding a sensitive position, the infringement may be classified as a higher grade, at the discretion of the Corporate Compliance Committee.

The failure of the suppliers or any third parties hired by the companies that integrate the Coral Homes Group to comply with the legislation in force at all times, as well as the Code of Ethics or the regulations of the Coral Homes Group, shall be submitted to the Corporate Compliance Committee for consideration, which shall introduce the appropriate sanction in accordance with the offence committed.

10 Approval, Follow-up and Review

This Code of Ethics has been approved by the Board of Directors of Coral Homes Holdco, S.L.U. (as parent company of the Group) on 24 July 2019 and has been last reviewed and updated on ~~2-1~~ December ~~2021~~2022.

In order to ensure the effectiveness of this Code of Ethics and other internal regulations that implement it, these shall be regularly reviewed and updated.

All significant amendments made to the present Code of Ethics shall be subject to the approval of the Board of Directors of Coral Homes Holdco, S.L.U., as parent company of the Group, the other Boards of Directors of the companies that integrate the Coral Homes Group being informed of the aforementioned, except for amendments of a clerical or developmental nature. In these cases, only the approval of the Corporate Compliance Committee shall be required.

Likewise, the governing bodies of the Coral Homes Group shall be informed every year about the application of this Code of Ethics and the internal regulations that implement it.

