

	COMPLIANCE POLICY	Code	IMS_POL_HL_001
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COMPLIANCE POLICY

In CELEO we are committed to promoting an ethical and compliance culture within our organization, in order to avoid any behaviour that may contravene the applicable law and the commitments voluntarily assumed by the company, damage the reputation of the company or negatively affect its public image.

Our core Compliance principles are:

Ethical culture and zero tolerance

In CELEO we encourage among our employees and other stakeholders a behaviour aligned with:

- Development, promotion and strengthening of an ethical and compliance culture within the company, upholding full respect of the applicable law, together with any additional commitments voluntarily assumed by our organization.
- Zero tolerance towards non-compliance or non-observance of the principles set out in our Compliance Policy, as well as bad practices in terms of ethics and integrity.

Fighting against fraud, corruption and bribery

- In CELEO we do not commit nor participate in actions that may imply any kind of bribery, fraud or corruption. To this end, we support, encourage and work in the fight against bribery, fraud and corruption, in any of its forms.
- We implement, in our strategical analysis and compliance policies, actions which allow us to prevent, detect and act against any situation or circumstance that may favour any kind of fraudulent act, corruption or bribery.

Integrity in our activities

- In CELEO we constantly seek to promote among our employees and other stakeholders the development of their activities in an **ethical** way and with **integrity**, based on the principles of honesty, transparency and respect. In this way, we seek to ensure the fulfilment of fiduciary duties, such as: confidentiality of information, avoiding conflicts of interests and the duty not to take personal profit from business opportunities related to investments, contracts or corporate operations.
- We do not envisage any contribution to political causes in our strategic framework.

Responsibility

- In CELEO we maintain our Compliance Programme to identify the associated risks, as well as to design and execute the controls needed to mitigate them. In addition, we promote training activities and prevention campaigns. In this way, we encourage ethical and responsible behaviour among our employees and company stakeholders.
- We promote a responsible and transparent attitude, enabling confidential and efficient communication and transparency channels. We thus offer guarantees in the transmission of any sensitive information and protection to anyone who, in good faith, wishes to communicate any type of irregularity, conduct that contravenes the applicable law, or possible violation of the principles set out in our Compliance Policy.

Continuous improvement

- We are committed to the continuous improvement of our compliance processes at all levels of our organization, fostering an ethical and compliance culture.