



CODE OF ETHICS
EUROPA EDUCATION GROUP

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1. INTRODUCTION

1.1. Who we are.

The Europa Education Group is a group of higher education entities comprising private universities and private higher education centres in Spain and Portugal that welcomes more than 50,000 students of multiple different nationalities.

Europa Education Group considers academic excellence one of its strategic pillars. Thus, our educational model has made its own the principles of the European Higher Education Area based on the holistic learning of the person. In this model, the teacher is a reference and also a counselor who accompanies the student throughout his or her university life. The student, on the other hand, traces his or her own educational path by developing the knowledge, competencies, skills and values that today's society demands. Our model places special emphasis on the maturity and autonomy of the student, so that he or she learns to adapt to an increasingly complex and perpetually changing world.

The mission of the entities of the Europa Education Group is to provide our students with a comprehensive education, training leaders and professionals prepared to respond to the needs of a global world, to add value in their professions and contribute to social progress from an entrepreneurial spirit and ethical commitment. To generate and transfer knowledge through applied research, also contributing to progress and placing ourselves at the forefront of intellectual and technical development.

1.2. What is the Code of Ethics

The Europa Education Group's Code of Ethics includes the set of guiding principles and standards of conduct that must guide the behaviour and regular performance of the functions and actions of all those who make up the Group's entities.

To this end, this Code of Ethics is based, among others, on:

- The United Nations Universal Declaration of Human Rights.
- The principles of the United Nations Global Compact.
- Applicable law.
- Any other regulations that may be applicable in view of the activity of the entities.

1.3. Principles and values

The members of the entities of the Europa Education Group will support their actions and promote, within the scope of their competences and responsibilities, respect for the following general principles and values:

A) Freedom, equality and non-discrimination.

In the Europa Education Group, respect, consideration and promotion of the principles of freedom, equality and non-discrimination become a fundamental pillar of the tasks and functions undertaken by all the members of its entities in their daily performance and, in particular, in those related to teaching and learning.

The fundamental right to freedom of teaching becomes the axis around which academic activity revolves, exercised within the framework of university autonomy, the freedom to create educational centres and universities and respect for the institution and its reputation.

The employees and members of the entities of the Europa Education Group will encourage and promote the defence of freedom, equality and non-discrimination in their daily activity.

B) Quality and excellence.

The entities of Grupo Europa Education place their emphasis on quality and excellence in the products and services they provide, with the aim of exceeding the common standards of any educational institution.

The totality of educational activity is aimed at achieving a high degree of quality and excellence in teaching and in the rest of the educational, research, organizational and any other type of services that are carried out.

The Europa Education Group reaffirms its commitment to setting standards that guarantee the achievement of the objectives of quality and excellence, standards that allow the quality of the teaching product and service to be evaluated, as well as compliance with the standards required to achieve these objectives.

C) Responsibility and commitment to the institution, to our students and to society.

The entities of the Europa Education Group will promote the cooperation and collaboration of their members in the improvement and achievement of the mission of the institutions, maintaining a loyal behaviour towards them, in order to create an institutional link between all its members, committed to the improvement of the Universities and Centres and the achievement of their objectives and purposes.

Likewise, in accordance with its social involvement and its commitment to society, Europa Education Group will promote activities of interaction with the social environment and condemn antisocial and discriminatory behaviour, favouring economic, social and environmental values and principles in accordance with sustainable development.

D) Values

Our purpose is to positively impact people's lives through higher education. This commitment is reflected in the way we engage with our students, colleagues, and society at large. That's why our actions must be guided by a set of core values that not only define us as an organization, but also guide our daily decisions.

We have established the **five core values of our corporate culture**, which define our work and guide us as an organization.

1. **Passion for Excellence:** This value drives us to put the student at the center of all our decisions, always seeking to anticipate their needs. Continuous improvement allows us to exceed the usual standards and positions us as a benchmark in the education sector.
2. **Care for People:** At Europa Education we foster an environment of respect, collaboration and empathy, valuing both individual achievements and collective well-being. We are receptive to concerns and suggestions, which strengthens our educational community and creates bonds of trust and respect
3. **Courageous Innovation:** This value invites us to question the status quo and approach challenges with creativity and audacity. Innovation is a daily reality at Europa Education, where a culture of continuous learning is fostered and curiosity and experimentation are valued.
4. **Trust and Accountability:** Mutual trust and transparency in communications and decisions are essential in the Group. We promote a culture where every person has the freedom to make informed decisions and take responsibility for their actions.
5. **Diversity and Inclusion:** Europa Education promotes an inclusive and socially responsible environment, valuing and respecting cultural differences and opinions. Inclusion is a daily practice that strengthens the educational community and allows us to move forward together towards success.

2. WHO IT APPLIES TO

The scope of application of the Code of Ethics is limited to all the people and groups that make up the entities of which Grupo Europa Education is a part, made up of the governing bodies, the

teaching staff, the non-teaching departments. Likewise, its principles and values will also be extended to the relationships that the Europa Education Group and its staff maintain with third-party service providers or collaborators.

In particular, this Code of Ethics applies to:

1. All employees and persons who provide services to the entities of the Europa Education Group, including those belonging to teaching and non-teaching departments, clinics, faculties and schools, own or affiliated centres, and any other with an employment relationship or under any contract regime with the entities of the Europa Education Group.
2. Governing and administrative bodies of the entities of the Europa Education Group, the Board of Directors, the Management Committee, the Governing Council, the Advisory Councils, hereinafter also referred to as "Representatives". For this purpose, Representatives are considered to be the legal representatives, including the legal administrators who are authorised to make decisions on behalf of the entities of the Europa Education Group, and the de facto administrators and other external bodies, and any natural or legal person linked to the Europa Education Group by legal relationships and/or of any nature other than employment, to act on your behalf.
3. The Code of Ethics is applicable to all suppliers, collaborators, agents and auxiliary companies, who must also work in accordance with the rules and behaviours detailed in this Code of Ethics when carrying out commercial activities on behalf of the entities of the Europa Education Group or under their instructions.

3. PEOPLE

3.1. Respect for people

Europa Education Group and, in particular, the persons to whom this Code of Ethics applies, must:

- Respect the dignity of people at all times.
- Reject and prevent intimidation, harassment of any kind, whether psychological, moral or sexual, as well as any conduct that involves disrespect or consideration or any other act of verbal or physical aggression.
- Treat people fairly and equally, and must act with respect for the diversity of cultures, religions, sexual orientations, opinions and/or marital status of people or any other personal or social condition.

In relations between employees, whatever they may be, as well as in those of these with any of the companies, entities and people with whom the entities of the Europa Education Group collaborate or maintain commercial relations, respectful and professional treatment must prevail in order to promote a cordial and safe work environment.

3.2. Respect for our students

The persons to whom this Code of Ethics applies, and especially teachers, must:

- Maintain a professional relationship and mutual respect with students.
- To recognise the knowledge and skills of students who can contribute to the teaching-learning process, carrying out their teaching at the times and spaces provided for this purpose and completing the academic results within the deadlines provided for in the internal regulations.
- To teach with full respect and observance of the regulations of the Universities and Centres, as well as the legal provisions in force.
- To respect in all areas the prestige, reputation and good name of the Universities and Centres, of any of their members and of their students.

3.3. Equal opportunities

The persons to whom this Code of Ethics applies, and especially those employees who are entrusted with the functions of selection or team leadership, must:

- Respect, at all times, the principle of equal opportunities, always acting with full objectivity and attending, in all cases, to the adequacy of the candidates' profiles to the needs that must be met.
- Respect the right of people to work or collaborate with the entities of the Europa Education Group, not impeding their promotion or the development of their professional career on the basis of their race, religion, sex, sexual orientation, origin and/or marital status, or any other personal or social condition.
- To promote cultural diversity by creating a work environment in which people have the opportunity to develop professionally and personally.

3.4. Prevention of work, sexual and moral harassment.

All people have the right to be treated with respect, dignity and fairness, so a workplace free from any form of harassment or harassment is offered.

Harassment or harassment of staff members or third parties is not allowed. Similarly, sexual harassment of employees is not allowed, nor of third parties with whom a professional relationship of any kind may be maintained.

To this end, the appropriate measures will be adopted to prosecute intimidating conduct, as well as those consisting of psychological, work, moral or sexual harassment. In relation to teaching staff and non-teaching staff who provide their services in any of the entities of the Europa Education Group, the Internal Action Protocol for the Prevention of Workplace Harassment in the Europa Education Group will be applicable.

3.5. Data protection

The persons to whom this Code of Ethics applies, must:

- Use only the personal data that is essential for the exercise of their activity.
- Treat personal data confidentially, loyally and lawfully.
- Follow the processes established by the Europa Education Group in accordance with data protection policies, so that:
 - There is a sufficient legal basis, either the consent of the interested party or any other provided for in the applicable regulations, for the processing of the personal data of the interested party.
 - The right to information of the data subjects whose personal data is requested is guaranteed, to the identity of the data controller and their contact details, the purposes of the processing, the mandatory or optional nature of the answers to the questions asked, the consequence of obtaining the data, the possibility of exercising the rights of access, rectification, cancellation, opposition, portability and limitation, as well as any other rights that may be applicable to them.
 - The exercise of the rights of access, rectification, opposition, deletion, cancellation, portability or limitation in accordance with data protection legislation is facilitated.
 - The personal data of third parties are used only for purposes compatible with those for which the data were collected.

- Maintain professional secrecy regarding the personal data of clients and any other person to whom they have had access, as well as the duty to keep them. This obligation will subsist even after the end of the employment or professional relationship with the Europa Education Group.
- To transfer personal data only in the cases provided for by law.
- Adopt all necessary and appropriate technical and organisational measures to guarantee the security of personal data and prevent its alteration, loss, processing or unauthorised access.
- Notify the Data Protection Officer (DPO) of security breaches that occur on personal data, as soon as they become aware of them.
- Participate in the training activities developed by the Europa Education Group.
- Collaborate diligently with the Europa Education Group in all matters that may arise in Data Protection and, in particular, in those relating to information requirements or inspection actions.
- Comply with the policies, processes and instructions received from Grupo Europa Education and, where applicable, from the compliance body in charge of data protection.
- Collaborate with the data protection compliance body in the performance of its work.

3.6. Conflict of Interest.

The employees of the Europa Education Group must act in the proper fulfilment of their professional duties and responsibilities and may not carry out professional activities outside the institution that may enter into direct competition with their activity within it, unless special and express authorisation is given by the persons authorised to do so by the Europa Education Group.

In those cases where there is any possibility that personal interests collide or interfere, directly or indirectly, with the interests of the Europa Education Group, the affected employee must immediately inform the Compliance Committee.

3.7. Health and safety

The Europa Education Group is committed to guaranteeing the level of protection against the risks arising from its activities, as well as promoting improvements in health and safety conditions. To this end, the integration of prevention at all hierarchical levels and in all its activities, whether teaching, administrative or research, is a priority objective. In this sense, the entities have an occupational risk prevention plan, which establishes a framework that includes the main lines of all actions that must be undertaken in this area, both to comply with legal requirements and to guarantee continuous improvement, and transmits it to each and every one of the members of their organization.

To comply with this commitment, the Spanish institutions of the Europa Education Group have an occupational risk prevention management system based on the ISO 45001:2018 standard. They have an occupational risk prevention plan, which is developed by specific procedures and instructions to achieve the integration of prevention within the activities of the Universities and Centres.

4. SOCIAL RESPONSIBILITY AND THE ENVIRONMENT

4.1. Social responsibility.

The Europa Education Group maintains a firm commitment to social progress through education, to the talent of our university community and to the positive impact it generates on society. To this end, it promotes measures and actions for the promotion of social entrepreneurship, for the promotion of diversity -carrying out various actions to raise awareness in the university community-, as well as for the promotion of volunteering, among others.

The Europa Education Group is committed to managing its institutions in a sustainable way in the economic, social and environmental fields, with the aim of generating value for stakeholders from a triple perspective: economic soundness, social commitment and respect for the environment.

Similarly, it promotes curricular sustainability for students with the aim of training professionals committed to sustainable development, in the economic, social and environmental spheres, putting individual competencies and skills at the service of positive social changes.

4.2. Environment.

The Europa Education Group assumes its commitment to environmental protection, animal welfare and sustainable development, adapting to the legislative framework and the commitments set by the European Union and other organisations in the growing fight against pollution.

The Europa Education Group embraces the principles of action in defence of the environment and animal protection formulated in the different applicable legal regulations and environmental policy statements, which serve as the basis for the planning and development of all its activities.

The Europa Education Group trains its students in values and behaviours that respect the environment, so that future professionals are also respectful citizens who are aware of achieving sustainable development.

5. GOVERNANCE

5.1. Transparency.

The principle of transparency is fundamental in the functioning of the Europa Education Group. The governing bodies, single-person positions, as well as the rest of the staff at the service of the Europa Education Group, will exercise their functions and carry them out with absolute transparency.

In addition, this principle of transparency requires that all public information and communication developed in the university environment be easily accessible, understandable and contrasted.

5.2. Confidentiality.

The Europa Education Group will ensure the protection of the confidential information in its possession, with absolute respect for privacy. All persons to whom this Code applies must refrain from inappropriately using or disclosing to third parties data, documents or information of a strategic or confidential nature obtained from or related to the entities of the Europa Education Group.

Confidential information includes, not only data that is owned by the Europa Education Group or that is private to third parties, but also data that students or other parties have entrusted to any entity of the Europa Education Group.

5.3. Obtaining Information.

The persons affected by this Code of Ethics must:

- Obtain commercial or market information without infringing legal regulations or private agreements established or agreed to protect it.

- Reject and avoid the use of any information that may have been obtained in breach of any legal regulation or private agreement signed by the entities of Grupo Europa Education.
- Sign contractual clauses aimed at preventing the transfer of confidential and/or protected information that could violate company secrecy.

5.4. Intellectual and Industrial Property.

The Europa Education Group is committed to the protection of intellectual and industrial property, including copyright, trademarks and patents, domains, designs, etc.

The Europa Education Group and, in particular, the persons to whom this Code of Ethics applies, must:

- Adopt the necessary measures to protect intellectual and industrial property.
- Avoid the use of works or creations of intellectual or industrial property of third parties without having the mandatory rights and/or licenses.
- Use only those images, trademarks and texts for which the corresponding authorization is available or are not protected by copyright.

5.5. Information on Social Networks.

The use of social networks will not damage the name, reputation or prestige of the entities of the Europa Education Group, or of any of its members or students.

The use of social networks will be carried out avoiding any action that may harm the entities of the Europa Education Group, its members or its students.

The persons to whom this Code of Ethics applies, must:

- Refrain from publishing content as representatives of Europa Education Group unless they have express authorisation.
- Refrain from publishing confidential information of Grupo Europa Education, or of students or collaborating entities.
- Refrain from using the logos, trademarks, information subject to copyright or other intellectual or industrial property rights of Grupo Europa Education, without express authorisation.

No media requests should be responded to directly. All queries made by the media about the entities of the Europa Education Group will be sent directly to the Management of the Communication Department.

5.6. Compliance with Laws, Rules and Regulations

The persons included in the scope of application of this code shall comply with all laws, rules and regulations in force in the countries where the entities of the Europa Education Group operate and shall maintain the appropriate measures to ensure compliance with such laws, rules and regulations.

6. PRESERVATION OF THE REPUTATION AND PUBLIC IMAGE OF THE EUROPA EDUCATION GROUP. DUTIES OF LOYALTY AND DECORUM.

6.1. Reputation and public image of the Europa Education Group

The Europa Education Group considers its image and corporate reputation as one of its most important assets in maintaining the trust of students and their families, public authorities and society in general. The persons to whom this Code of Ethics applies, and especially employees, must refrain from making statements or actions that may jeopardize the preservation of this asset and must take maximum care of the public image and reputation of the Group through diligent and appropriate behavior, taking into account at all times the effects that each of their actions may have on the good name of the institutions of the Europa Education Group.

6.2. Duty of loyalty

The persons to whom this Code of Ethics applies, and in particular the employees of the Europa Education Group, are bound by a duty of loyalty to the Group and to the entities that make it up, and therefore, in the exercise of their professional functions and duties, they must contribute to the prestige, dignity and reputation of the Group they represent and of which they are a part. avoiding those conducts, statements or attitudes that may damage the good name and image of the Group in the eyes of students, public authorities and society in general, and observing exemplary conduct in accordance with the values and principles of this Code of Ethics.

This duty of loyalty includes the obligation of the persons to whom this Code of Ethics applies to refrain from discrediting, discrediting, making derogatory comments or disseminating private conversations (or inducing or encouraging others to discredit, discredit, make negative comments or disseminate private conversations) about the Europa Education Group or any of its member entities, about, or maintained with, any of its officers, directors, shareholders or employees, in any communication with students, employees, media, suppliers or third parties.

For the purposes of this section, the term "discredit" shall mean any comment, statement or dissemination of conversations that may negatively affect the activity of the Europa Education

Group or that may have an impact on the image and reputation of the Group and/or its entities, directors, shareholders, directors, employees or third parties linked to its institutions.

Failure to comply with the obligations set out in this section will entitle the Europa Education Group to take the disciplinary measures it deems appropriate and/or to claim any damages that may be appropriate.

6.3. Decorum

The persons to whom this Code of Ethics applies must behave with due decorum in the performance of their professional functions and, in particular, while they are in or making use of the facilities or representing the entities of the Europa Education Group.

7. STUDENT ORIENTATION

Students and their training needs are at the heart of the Europa Education Group's activity. The persons to whom this Code of Ethics applies, and especially the employees who have direct contact with students, must pay preferential attention to the satisfaction of their needs and faithfully comply with all the functions and tasks that, in the development of their services for the Group, correspond to them, diligently and with faithful observance of the procedures and deadlines established internally by the Europa Education Group.

8. USE OF ELECTRONIC DEVICES OWNED BY GRUPO EUROPA EDUCATION

The Europa Education Group provides its employees with various computer equipment and tools that it owns, including personal computers, applications and software, internet connection and e-mail.

The proper use of computer equipment and tools is the responsibility of the employees who handle them, who must use them in a manner appropriate to their nature and refrain from engaging in any conduct or action that may be classified as abusive or incorrect.

By way of example, the following conducts are prohibited:

- (i) The intentional alteration of the computer software for purposes other than professional purposes.
- (ii) The installation and use of any computer application, file, image, document, screensaver, game or program whose license is not owned by the Europa Education Group and/or has offensive, inappropriate, pornographic or discriminatory content.
- (iii) Intentional and unauthorized access to, disposition and manipulation of files containing confidential or proprietary information.

- (iv) Abusive access to websites that are unrelated to the provision of services or that have offensive, inappropriate, pornographic or discriminatory content, as well as access to chats for personal use.
- (v) The sending and receiving of applications, files and documents not related to work through e-mail using the corporate image of the entities of the Europa Education Group, the interception and/or unauthorised use of the e-mail of other users, the sending of anonymous or mass e-mails and/or the opening and use of unauthorised personal e-mail accounts using the computer equipment owned by the Europa Education Group.

The use of computer equipment and tools by employees is limited, solely and exclusively, to professional purposes, without, consequently, being able to be used for personal or private use using the corporate image of the Group's entities. Exceptionally, sporadic access to the internet or the use of e-mail will be allowed when it is a matter of carrying out an inexcusable procedure or related to the reconciliation of personal and family life that is only feasible to carry out by this means, thus avoiding absence from your workplace. This use must in any case be occasional and be governed by a principle of prudence. In no case may it interfere with the work or performance of the employee or any other colleague.

9. RULES OF CONDUCT IN FINANCIAL MATTERS

9.1. Records and data

The persons to whom this Code of Ethics applies, and in particular employees who carry out functions related to the financial and accounting fields, must:

- Monitor financial flows that may have a criminal origin or destination.
- To inform and provide the necessary faithful and justified information to the natural person responsible for finances, in relation to those facts, circumstances or events that, in relation to the development of their activity and due to their significance, may significantly affect the results of the entities of the Europa Education Group.
- To reflect truthfully and fully, at all times, the state and economic and financial situation of the Europa Education Group.
- Refrain from communicating financial or non-financial information of the Group's entities to other unauthorised persons.
- Do not disclose any data on the economic and financial situation that could create a distorted or inaccurate image of the true situation of the same.

- The Europa Education Group's information on the economic and financial situation that it publishes and provides to official bodies and, in general, that which is officially provided, must faithfully respond to the economic reality of the Europa Education Group and its business and organisational structure.

9.2. Payments and collections

The persons to whom this Code of Ethics applies, and in particular employees who carry out responsible functions in entities of the Europa Education Group, must:

- Minimize, and if possible eliminate, payments and collections derived from commercial operations in cash.
- Review with special attention and control all those payments or collections:
 - a. carried out by/to a company with which business relations are initiated for the first time;
 - b. executed by a company whose payments or collections come from or must be made to an account other than the one that has traditionally been used in its commercial relations with the Europa Education Group;
 - c. made or received from an account or by an entity located in non-transparent countries;
 - d. carried out by/or by natural or legal persons not mentioned in the corresponding contracts; and
 - e. carried out by/to entities in which it is not possible to identify the partner, owner or ultimate beneficiary.
- Review, with special attention, extraordinary payments not provided for in the corresponding agreements or contracts.
- Respect, at all times, the policies established by the financial manager in relation to payments and collections, and all those that do not respond to these criteria or applicable regulations must be reported.
- To reflect clearly and accurately, in the records of the Europa Education Group, all transactions, operations, movements of goods and contracting of services.

9.3. Contract and Purchasing Policies

The employees of the Europa Education Group must comply with the processes provided for in the contracts and agreements policy, before their signature by the designated representative, as well as those provided for in the purchasing policy.

9.4. In relation to Corruption suppliers and gifts.

The Europa Education Group and, in particular, the persons to whom this Code of Ethics applies, must:

- Respect competition, establishing transparency as a principle of action in its commercial relations with third parties.
- To govern its commercial relations by objective criteria of price, quality, reliability and suitability of the product and always in full compliance with the existing legal regulations in the area where such relations are carried out.
- Refrain from giving any type of gift, gift, gift or retribution, of any kind, to public officials or authorities.
- Refrain from giving gifts, gifts, gifts or remuneration to third parties when they are being negotiated or there are tenders in progress.
- Refrain from accepting or giving gifts, gifts, gifts or remuneration to third parties, except in the case of a promotional gift and with the prior authorisation of the Compliance Committee, provided that they are not civil servants or public authorities.
- Offering or accepting cash gifts is expressly prohibited.
- The prohibition of gifts extends to any type of gift, except those admitted and established as common within social relations.
- Limit themselves to offering or accepting invitations to professional events, occasionally and reasonably, when they strictly conform to their professional activity.
- Guarantee the transparency and fairness of references and contracts, based on objective criteria.
- To inform the Compliance Committee of the Europa Education Group of the receipt or offer of personal advantages or favours of any kind, so that the measures established by regulation for this purpose can be adopted.
- To accredit, by means of the corresponding invoices, receipts and receipts, all the costs and expenses incurred as a result of gifts, promotional campaigns, etc., that are generated by reason of the activity of the Europa Education Group, including the date

of the expenditure, its concept, the identity of the person to whom the gift is made and the reason for which it was made.

- Adjust to the requirements of transparency and legality the actions of the Europa Education Group in tenders, contracting with administrations, autonomous bodies, State-owned or publicly owned companies of any nationality and/or country.
- The Europa Education Group must operate in the market in accordance with loyal, serious and responsible conduct, avoiding incurring or participating in any fraudulent or deceptive action that does not meet the required criteria of good faith and due diligence in commercial traffic.

9.5. Prevention of Money Laundering and Terrorist Financing.

The persons to whom this Code applies must act, at all times, in accordance with the provisions of the legislation on the Prevention of Money Laundering and Terrorist Financing and other legislation in force applicable in Spain and Portugal.

10. COMPLIANCE

10.1. Enforcement, Acceptance, and Disclosure.

The Code of Ethics is applicable to all the people, groups and entities that make up the Europa Education Group described in point 3 of this document, including the relations of the Europa Education Group and its staff with the external entities and companies that provide services or collaborate with the Europa Education Group.

All persons to whom this Code applies must undertake to accept, respect and promote all the principles and values that make up this Code of Ethics.

The dissemination of this Code will be carried out through its publication on the website of the entities of the Europa Education Group and will be the subject of appropriate communication, training and awareness-raising actions for its timely understanding and implementation.

10.2. Responsible parties.

The monitoring and improvement of compliance with and interpretation of this Code will be the responsibility of the Criminal Risk Prevention Committee, known for these purposes as the Compliance Committee, appointed by the Europa Education Group, which will also be responsible for ensuring compliance, resolving issues related to its content or doubts of interpretation, receiving notifications of possible inappropriate conduct, Troubleshoot and any other issues that may arise within its scope of application.

10.3. Non-compliance.

As a contribution to the good of the Europa Education Group and those related to its entities, the recipients of this Code must report actions contrary to its principles and values. In these cases, the Europa Education Group will launch the appropriate procedure for the investigation of the facts and the verification of those responsible, adopting the decisions it deems appropriate depending on the seriousness of the facts.

10.4. Whistleblowing Channel.

In order for the persons affected by this Code and those linked to them in the terms provided for by law to be able to inform the corresponding control body of a possible infringement of it, the Europa Education Group has set up a system that allows the corresponding complaint to be articulated, even anonymously, based on the duty of honesty in the accusations made. through the following link: <https://europaeducation.shogunmonitor.com/>

In application of the provisions of Law 2/2023, of 20 February, regulating the Protection of Persons Reporting Regulatory Infringements and the Fight against Corruption, the Europa Education Group will implement all the necessary precautions to guarantee the confidentiality of the data of the people affected by the information provided, especially that of the person who has brought the facts to the attention of the Europa Education Group, whose indemnity will be guaranteed

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