

Code of Ethics

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1 Purpose and Statement by Management

This document is a Code of Ethics (hereinafter, the “Code” or “Code of Ethics”) of the group made up of the companies Coral Homes Holdco, S.L.U. (as the parent company), Coral Homes S.L. and SERVIHABITAT Servicios Inmobiliarios, S.L.U. (as subsidiaries), (hereinafter, indistinctly, the “Group” or “Coral Homes”).

Since its creation, Coral Homes Group has operated according to certain basic principles and a clear premise: to be leaders in our industry by focusing on people and with a firm commitment to our social, environmental, and cultural surroundings.

Our Code of Ethics is a statement of the basic principles, values, and standards for ethics and integrity that guide our operations and bring together all Coral Homes Group employees under a set of values that orientate our decisions and daily actions.

The purpose of the Coral Homes Group Code of Ethics is to establish a set of ethical principles, values and standards of conduct by which the activity of all the companies and individuals the Code applies to must be ruled.

This Code of Ethics defines how we do business and describes the patterns of behaviour that should be encouraged and those that should be avoided.

It is the most important document in our regulatory structure. Its principles are embodied in policies, norms, and procedures. It represents Coral Homes Group commitment to comply with the legislation in force and the ethical values defined therein.

Real and effective application of these principles shall be monitored across all levels of the Coral Homes Group companies, so that this self-regulatory system helps eliminate any action that could place at risk the values and legal rights to safeguard.

Failure to comply with this Code shall constitute an infringement, which shall be subject to the corresponding sanction.

Considering that the link between a breach of the ethical principles and behaviours that are classified as crimes in the Criminal Code, and that the main obstacle in the effectiveness of a Code of Ethics is tolerance of breaches, Coral Homes Group has a zero-tolerance standard for all the levels across its organizational structure. Maximum collaboration is requested in reporting any detected risks via the Ethics Hotline, developed in section 8 of this Code, of any risk situation detected.

This Code of Ethics contains a disciplinary system to be applied in the event that any ethical principle contained in the Code is breached.

2 Scope of application and compliance

Our Code of Ethics applies to any and all individuals who are part of the Coral Homes Group, employees, executives, representatives and members of the governing bodies of the companies making up the Group; all of them are delivered a copy when they join the Group and they must read and agree to the content thereof.

All of them have a duty to comply with the Code of Ethics and promote the values and principles contained therein. Those responsible for areas and departments in the Group companies must ensure compliance with and application of the Code.

Coral Homes Group employees and executives sign an annual statement of compliance with the Code of Ethics where they declare that they have complied with the provisions thereof and undertake to fulfil them thereafter.

To the extent possible, the Code of Ethics shall apply to any suppliers, agents and third parties that the Coral Homes Group companies interact with in the development of their activity, through the inclusion of clauses of awareness and acceptance of the Code of Ethics in their contracts. Non-compliance with these clauses shall be considered serious breach of contract.

The individuals (hereinafter “Individuals Subject to this Code”) must understand, comply with and collaborate in the application of this Code.

Coral Homes Group encourages the Individuals Subject to this Code to report, via the Ethics Hotline or the Regulatory Compliance mailbox cumplimentonormativo@servihabitat.com, any situation in which they are unsure as to whether their own actions or those of other individuals could violate the ethical principles established in this document.

2.1 Sensitive positions

The behaviour of certain individuals, due to their position in the Coral Homes Group’s organisational structure, is particularly important in maintaining the reputation of the Group and its companies and guaranteeing that their commitments are fulfilled.

This Code refers to such individuals as persons with sensitive positions and considered as belonging to this category are the following:

- The Executive Team of the Coral Homes Group companies (members of the Boards of Directors, Management Committee, Area Managers and Department Managers),
- Anyone that, as defined by the Coral Homes Group’s Compliance Committee, develops functions that affect significantly the way in which the businesses in the Group companies are developed.

The individuals who hold these positions must consider a series of behavioural guidelines, in addition to those required for all employees, due to the potential influence of their actions on Coral Homes Group reputation.

2.2 Acceptance process

In general, the Code must be accepted as follows:

- In the case of members of the Executive Team and all other employees, when they are approved or when they join Coral Homes Group companies, by signing and accepting the Code.
- In the case of employment and business relationships already in place at the time the Code is approved and comes into force, the Department of People (Human Resources) shall obtain, through procedure that ensures its effectiveness, the relevant acceptance no later than one (1) month after effective approval of the Code.
- Suppliers and third parties with whom a relationship is held in the future shall accept the Code of Ethics at the start of the relationship or, as the case may be, when undergoing their approval process. Exceptionally and if authorised by the Regulatory Compliance Area of the relevant Coral Homes Group company, the company in question may choose to approve the Code of Ethics of the supplier or third party in question and the process of acceptance of such Code by its employees, verifying that such Code includes the Coral Homes Group's fundamental principles and standards.

2.3 Responsibility of the Individuals Subject to this Code

For the proper development of Coral Homes Group activity, the Individuals Subject to this Code must perform their duties with due professional diligence and undertake the obligation of becoming familiar with and understanding the implications of this Code, which they are individually committed to fulfil.

In addition, any individual subject to this Code undertakes the following commitments:

- To report, via the Ethics Hotline or the Regulatory Compliance mailbox cumplimientonormativo@servihabitat.com, any situations that might involve a breach of this Code, even if those situations are not related to activities within their professional area, and specifically when the situation in question involves the risk of breaching any of the legal or contractual obligations the Coral Homes Group companies are subject to.
- To provide the Regulatory Compliance Department of the relevant Coral Homes Group company with the necessary information, for this Department to verify compliance with the Code.
- To inform the Regulatory Compliance Department and the Legal Department of the relevant Coral Homes Group company of any legal/criminal proceedings in which he/she has been charged, accused or convicted and which might have an impact on his/her performance or on the reputation of the Coral Homes Group companies or the Group itself, or which relates to facts connected to activities also carried out by Coral Homes Group companies. This duty to inform also includes sanctioning administrative proceedings as processed by organisations that supervise the operations of these companies and in which the companies might be involved.
- The Individuals Subject to the Code are under an obligation to collaborate actively and diligently with the Coral Homes Group companies, following the instructions received from the Legal

Department of the relevant Coral Homes Group company, in order to defend their interests before any judicial, arbitration and/or administration body. It is mandatory to appear before judicial, administrative and/or arbitration bodies where a direct citation is received from said bodies, either at one's home address or at one's professional address. Furthermore, those subject to the Code shall collaborate with these companies when so requested, to prepare and/or assist in an appearance or statement in any process.

If requested by the Regulatory Compliance Department, the Individuals Subject to this Code must sign a statement, via physical or electronic transmission means as determined at the time, confirming their compliance with the commitments arising from their acceptance of this Code.

Coral Homes Group has a disciplinary system in operation aligned with the labour legislation in force; it is a fundamental tool for protecting internal policies and procedures. Non-compliance with the Code of Ethics, the Penal Compliance Management System and/or the Money Laundering and Terrorism Financing Prevention Handbook is considered a very serious breach in terms of application of the appropriate disciplinary measures and can, therefore, lead to disciplinary actions, including, as the case may be, termination of the relevant employment or business relationship. This internal disciplinary procedure is in addition to any external liability that the employee in question might incur as a result of his/her actions.

The Code of Ethics will enter into force when it is made available to its recipients, either physically or through publication on Coral Homes Group's intranet.

3 Our principles and values

The Coral Homes Group is committed at the highest level to the principles and values below, on which the Code of Ethics is based, and the Group will develop the necessary policies and internal procedures to fulfil its commitments.

3.1 Principles of transparency and anti-corruption rules

"Being honest and transparent generates trust, a fundamental value for Coral Homes Group"

The trust of shareholders, customers and, in general, of the environment in which the Coral Homes Group operates underlies its business activity. Trust can only exist if the Group's integrity and transparency are beyond all doubt.

For this reason, the company bases its relationships on the principles of transparency and equal opportunities, and it rejects any actions aimed at gaining an advantage over the competition, in the market or in public and private contracts, and based on unlawful acts.

The Coral Homes Group upholds the zero-tolerance principle as regards corrupt practices. For this reason, together with this Code, the Coral Homes Group approves its anti-Corruption and Fraud Prevention Policy.

Any action or strategy intended to guide or influence the action of a public official or authority shall be considered **influence peddling** where a situation arising from the personal relationship with this or

another public official or authority is used to obtain a decision that can directly or indirectly result in an economic gain or to avoid a loss of any kind for the company or a third party.

Therefore, no member of Coral Homes Group shall, in the performance of their professional activity, offer or give, directly or indirectly, gifts, remuneration, commission, presents or other unauthorized advantages to public authorities, public officials, or executives of private companies, either in cash or otherwise, or influence public officials in any way, taking advantage of a situation stemming from their personal relationship with such public officials, in order to obtain preferential treatment in the awarding of contracts or other professional services or benefits either personal or for Coral Homes Group.

No member of Coral Homes Group shall use their professional position to demand, accept, obtain, or assure promises of preferential treatment, advantages, loans, commissions or bribes from third parties. Exceptionally, it will be permitted to give or receive gifts and presents if the following three conditions are met:

1. Their economic value is unquestionably irrelevant.
2. They are standard business gifts.
3. They are not prohibited by law or by generally accepted business practices.

These exceptions regarding the acceptance of gifts and other presents should, in any event, be reported to and approved by the direct superior of the employee who receives them. The procedure is detailed in the Anti-Corruption and Fraud Prevention Policy, the purpose of which is to create an environment where the risk of fraud is minimised.

Buying and purchase and/or renting real property marketed by Coral Homes Group by Coral Homes Group employees and external commercial partners (real estate agents, brokers, intermediaries, etc.) is subject to the conditions established in the internal regulation "B.3.8. Purchasing/renting properties by employees or partners" that is in force at the time.

Coral Homes Group has a *Compliance Policy* reflecting the Compliance commitments undertaken by the Company and an *Anti-Corruption and Fraud Prevention Policy* the purpose of which is to reduce the risk of fraud. In addition, Coral Homes Group provides all its employees with the necessary tools to solve any doubts as might come up in connection to the Anti-Corruption and Fraud Prevention Policy (through the Compliance mailbox: cumplimientonormativo@servihabitat.com), as well as to report any possible non-compliance with the Policy (*Línea Ética* <https://lineaeticaservihabitat.i2ethics.com/>)

The Coral Homes Group companies may have relationships with political parties within the framework of legal regulations and in compliance at all times with national laws for funding political parties.

It is not permitted to make donations to political parties or to the foundations linked there to.

A conflict of interest is defined as a situation in which the interests of a customer or potential customer conflict with the interests of another customer and/or The Coral Homes Group companies interests, with the ensuing material risk that the interests of one or more customers may be adversely affected.

Avoiding conflict-of-interest situations is a duty across all levels within The Coral Homes Group companies.

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Potential conflicts between the interests of employees, executives and shareholders and those of our customers or of Coral Homes Group must be avoided. Conflicts of interest that may appear among our customers should be avoided too.

In this fashion, all the individuals who are part of the Coral Homes Group will act placing the Group's and its customers' interests before their own, those of their relatives or of any other parties related thereto.

In addition, any potential conflict of interest as might occur within the Coral Homes Group companies must be reported.

In order to identify the types of conflicts of interest that may arise in the provision of services, and where such conflicts could damage the interests of a customer, it should be taken into consideration, at least, whether the Coral Homes Group company, an "authorized individual" - director, partner, manager or employee of Coral Homes Group – or a person directly or indirectly related to Coral Homes Group through a relationship of control or of outsourced services, is in one of the following situations:

1. The Coral Homes Group company or the person in question may obtain a financial profit or avoid a financial loss at the expense of the customer.
2. The Coral Homes Group company or the person in question has an interest in the result of a service provided to the customer or of a transaction carried out on account of the customer which is different from the customer's interest in the result.
3. The Coral Homes Group company or the person in question has financial incentives or otherwise to promote the interests of another customer or group of customers over the customer's interests.
4. The Coral Homes Group company or the person in question carries out the same activity as the customer.
5. The Coral Homes Group company or the person in question receives or will receive, from someone other than the customer, an incentive in relation to the service provided to the customer, in the form of money, goods or services, apart from the commission or standard remuneration for such service.

3.2 Prevention of Money Laundering and Terrorism Financing

“Obeying the law and other regulations in force must be a guiding principle of all the individuals who form part of Coral Homes Group”

The fight against money laundering and terrorism financing as referred to in the recommendations from the Financial Action Task Force (FATF) and the rules stemming from them, in addition to being a legal obligation, is a priority for the Coral Homes Group, with Coral Homes, S.L. and Coral Homes Group Servicios Inmobiliarios, S.L.U. being entities subject to the Code.

Neither Coral Homes Group nor its employees or partners shall carry out or get involved under any circumstance in activities that entail the laundering of money originating from activities related to drug trafficking and/or terrorism (of an illegal origin, in general). Coral Homes Group complies with anti-money laundering regulations and fully cooperates with the authorities responsible for the fight against money laundering or the funding of illegal activities.

To guarantee compliance with laws and regulations against money laundering, Coral Homes Group has a Money Laundering and Terrorism Financing Prevention Handbook, as well as departments responsible for ensuring compliance therewith. All employees, shareholders, executives and partners must be familiar with the applicable internal regulations for the prevention of money laundering that are distributed to them.

Any indication of a risk situation in this area must be immediately reported via the Ethics Hotline <https://lineaeticaservihabitat.i2ethics.com/>.

3.3 Protection of free competition. Consumer and market regulation

“Coral Homes Group believes in honest and loyal free competition”

The Coral Homes Group companies operate in the market by respecting the principles of free competition and equal opportunities and it rejects actions aimed at obtaining an unfair benefit or advantage over customers, suppliers, competitors and other market agents.

Employees and partners involved in commercialization tasks must never compromise the quality of the products and services, and they must perform their commercialization activities in a responsible and transparent manner.

Customers must be treated ethically, equally and, in all cases, in compliance with the applicable laws.

Similarly, Coral Homes Group’s suppliers must comply with and abide by the ethical principles and standards contained in this Code.

As a result, the following actions or behaviours are not considered ethical and are therefore prohibited:

1. Unauthorized access to confidential information about other companies.
2. Industrial espionage.
3. Disclosing business secrets.
4. Using internal or external privileged information for any type of transaction or business.

5. Actions aimed at creating false advertising.
6. Scams, frauds and deceits of any type.
7. Spreading false rumours about products, services, market conditions, etc.
8. Tactics aimed to alter the price of third-party products.
9. Tactics aimed at altering the price or value of a company.
10. Manipulating public tenders.
11. Falsifying payment methods.
12. Tactics aimed at bankrupting the company in order to defraud creditors.

As regards these activities, special attention must be paid to the following unauthorised behaviours, among others:

1. Accessing data, technical product information or business strategies of a competitor through a shared supplier, a family member, person of trust, or an investigation that goes beyond the information that is considered to be public.
2. Making false statements or promises to a customer or the market about the features or characteristics of a Coral Homes Group product or a competitor's product.
3. Falsifying the company's economic and financial information and, in particular, the financial statements.
4. Spreading rumours in social networks, the media, or directly to customers about a competitor, its products and services, or about any other company.
5. Taking advantage of restricted information that has been accessed thanks to the position held or the work carried out in the company in order to transfer the information to third parties, sell it, or use it to obtain or sell shares, or for any other transaction or business.
6. Performing any disloyal action that places Coral Homes companies or the Group itself in an advantageous market position.

3.4 Right to equality and non-discrimination principle

"We respect persons, their dignity, and fundamental values"

One of the fundamental values in Coral Homes Group operations is respecting individuals and their dignity. The company supports the Universal Declaration of Human Rights adopted by the United Nations in 1948, as well as the instruments stemming from it, particularly the International Covenant on Civil and Political Rights of 1966; the International Covenant on Economic, Social, and Cultural Rights of 1966; and the Convention for the Protection of Human Rights and Fundamental Freedoms of 1950. It also accepts and respects the principle of union representation of its employees.

All the individuals included in the scope of application of this Code of Ethics must respect the dignity of our customers, employees, shareholders, governing bodies, suppliers and, in general, any individual or legal entity that interacts with Coral Homes Group companies.

Coral Homes Group commitment is based on providing equal opportunities for joining our company, promoting oneself professionally within the company, and collaborating with it. Therefore, Coral Homes Group prohibits all types of discrimination, harassment, abuse or inappropriate treatment based on gender, race, colour, nationality, creed, religion, political opinion, affiliation, age, sexual orientation, state, incapacity, disability and any other conditions protected by the law, both with regard to our customers,

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employees, shareholders, governing bodies, suppliers and, in general, any individual or legal entity that has a relationship with Coral Homes Group.

Coral Homes Group's employees are selected and promoted in accordance with their aptitudes, training, knowledge, experience, leading skills, diversity of thoughts, personal aspirations and potential in future. No other factor shall influence or affect the objectivity of these decisions. Meritocracy is a basic principle when it comes to attracting, retaining, hiring and developing talent.

A basic principle of the Coral Homes Group's action is to offer the same opportunities in terms of access to work and professional development, ensuring at all times that there is no discrimination based on gender or sexual orientation, race, faith, origin, civil status, age or social background. Therefore, those participating in hiring, selection and/or professional promotion processes shall act objectively as regards their actions and decisions, with an open mind towards diversity and with the purpose of identifying the individuals that best meet the profile and needs involved in the job in question, promoting at all times equal opportunities and diversity and meritocracy.

Coral Homes Group undertakes to maintain a work environment free of harassment, intimidation and offensive or inappropriate conduct, including sexual suggestions or propositions, graphic materials and any other actions that might offend a person's dignity.

Coral Homes Group promotes a balance between professional and family for the individuals who are part of the entity, as well as equal opportunities among employees of different genders, in accordance with the law.

Respect for this principle is safeguarded across all levels of of the Coral Homes Group companies and it is the responsibility of those subject to the Code to prevent the behaviours listed above taking place and, if appropriate, to report them internally through the channels set up for the purpose.

As part of its commitment in this area, Coral Homes Group has approved an Equality Plan and a Prevention and Action Protocol in the event of harassment.

3.5 Occupational health and safety

“Coral Homes Group recognizes and guarantees appropriate health and safety measures”

Coral Homes Group recognizes and guarantees occupational health and safety as a fundamental right of all its employees by implementing legally established prevention systems.

All the jobs to be performed in Coral Homes Group companies must comply with the safety conditions required by occupational risk prevention regulations, and this principle must also be followed by the suppliers that collaborate with these companies.

Our commitment is focused on eliminating risks by applying and complying with Occupational Health and Safety regulations, as well as by implementing prevention, training, and information programmes.



3.6 Worker rights

“Coral Homes Group respects the individual rights of each employee”

Coral Homes Group will never impose working or Social Security conditions that harm, suppress or restrict the worker rights recognized by legal provisions, collective agreements or individual contracts.

In addition, employees will not be hired without registering them with the appropriate Social Security system.

Foreign workers will not be hired if they have not obtained the appropriate work permit. In addition, contract simulation or placement techniques will not be applied.

Deceitful or false working conditions will never be offered to existing employees or to individuals participating in a selection process.

As an extension of the freedom of thought, expression, and assembly, Coral Homes Group is committed to protecting the right to trade union freedom, the right to strike and the right to collectively bargain of its employees. It will respect their freedom to establish permanent non-profit making groups aimed at specific purposes, always in accordance with the legislation in force.

This principle is also required of the suppliers providing their services to Coral Homes Group companies.

3.7 Respecting the Tax Administration and the Social Security

“Observing the law and other regulations in force must be a guiding principle for all the individuals who are part of Coral Homes Group”

The Coral Homes Group companies complies punctually with its tax and Social Security obligations.

The company’s accounting of these companies and of the Coral Homes Group must show a true and fair view of its economic situation and include all the payments it makes and receives. Tactics aimed at concealing revenue or profits will not be tolerated.

Individuals at all the levels of the Coral Homes Group companies must be alert in order to detect any customers or suppliers that attempt to use the company’s structure for fraudulent transactions with the Tax Administration or the Social Security.

3.8 Respecting urban planning laws

“Observing the law and other regulations in force must be a guiding principle for all the individuals forming part of Coral Homes Group”

Coral Homes Group bases its management of real estate assets and its construction, building and urban development initiatives on the observance of urban planning laws and the applicable national, regional and local regulations.

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Coral Homes Group does not carry out unauthorized urban development or construction or building projects on land classified for roads, parks, or public domain assets, or areas that have been legally or administratively recognized for their landscape, ecological, historical, or cultural value, or that have been given special protection for these reasons.

Coral Homes Group will not promote the re-zoning of land or the modification of planning instruments, urban development projects, division into plots, new division of plots, construction or building projects, or licences that infringe on land use or urban development regulations in force.

3.9 Respecting the environment, collective security and public health

“Coral Homes Group is firmly committed to environmental conservation”

One of Coral Homes Group fundamental values is respecting the environment, and the Company is committed to conserving the environment by following the applicable legislation in force and implementing procedures aimed at reducing the environmental impact of its operations.

Individuals at all levels of the Coral Homes Group companies must ensure the rational use of resources, respect the environment and focus on sustainability.

Coral Homes Group will establish controls on activities that may pose a direct or indirect risk to collective security and public health. For this purpose, the Company has approved its *Quality and Environmental Management Policy*.

As part of its commitment to this matter, Coral Homes Group has obtained the ISO 14001 Environmental Management certification.

3.10 Right to privacy: Professional Secrecy, Confidentiality and Data Protection

“We protect the confidentiality of the information entrusted to us by shareholders and customers”

Coral Homes Group respects and protects the privacy of the individuals who provide personal or confidential information as part of their interactions with the entity.

The confidentiality of any information related to our customers, employees, shareholders and suppliers is the mainstay of the relationship of trust that defines our operations.

All the individuals who are part of the Coral Homes Group must comply with the data protection standards and shall keep strictly confidential any data that come to their knowledge because of their professional activity.

The internal rules on the processing of personal data and the confidentiality of data, as well as the legislation in force at any given time on data protection, must be respected.

The Coral Homes Group companies are under an obligation to protect the customers' personal information they have access to due to the provision of services thereto. Coral Homes Group is also required to protect the personal and/or confidential information of its employees, the members of its

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governing bodies and any individual or legal entity it interacts with. It must be presumed that any and all information received is confidential. Coral Homes Group contractually requires third-party suppliers to maintain the confidentiality of information and to apply appropriate security measures to the data that may be accessed in the process of providing services.

The information received may only be used for the purpose for which it was submitted and/or collected. Before submitting information to third parties, we must first confirm that we are authorized to do so.

Employees and suppliers that access personal information must handle it in accordance with the Code of Ethics and the legislation in force.

Measures that guarantee appropriate data collection must be applied to marketing campaigns, with the required consent and the necessary details so that interested parties understand the scope and purpose of their data processing.

Coral Homes Group reviews the channels through which personal data is obtained and ensures that all the necessary requirements for compliance with applicable regulations are met.

Reports submitted via the Ethics Hotline are protected by the obligation of secrecy of the individuals who manage the line.

Coral Homes Group information shall be used only for professional purposes, never for personal purposes.

3.11 Intellectual and industrial property rights

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

Coral Homes Group bases its policy of creating intangible assets by encouraging creativity and innovation.

It is not permitted to reproduce or copy, in whole or in part, the intangible assets of third parties without the required prior authorization in writing, or to transform or modify, in whole or in part, or import or distribute such assets.

Assets protected by intellectual property rights include books, videos, music, fonts, advertising campaigns, slogans, brochures, catalogues, texts, speeches, presentations, reports, studies, drawings, graphics, paintings, comics, projects, blueprints, maps, scale models, architectural/engineering designs, computer applications and any other protected work, even if the copyright symbol or “all rights reserved” does not appear.

All the applications installed on the Coral Homes Group companies computers and mobile devices must have the relevant licence for use.

Trademarks, patents, industrial designs, domain names and other intangible assets are also protected by industrial property rights.



3.12 Computer security principle

“Coral Homes Group is committed to implementing the necessary security measures so as to guarantee the integrity and confidentiality of information”

Individuals at all the levels within Coral Homes Group must work towards preventing and controlling any crimes that could be committed using information technology.

These crimes include actions prohibited by the company, such as:

1. Unauthorized access to the computer systems of competitors, customers, or any other public or private companies or entities.
2. Spreading viruses or computer programs that can damage tangible or intangible assets.
3. Denial-of-service attacks.
4. Manipulating electronic auctions.
5. Any other type of computer damage, including sabotage or altering the data or information stored in an external computer system.
6. Electronic scams, such as phishing, pharming, and any type of deceit that uses information technology or social engineering.
7. Spreading rumours, criticisms, and boycotts over the Internet and social networks, including “retweets” and resending messages of any type.
8. Carrying out false advertising campaigns and promotions.
9. Infringing on the intellectual or industrial property rights of technological assets.
10. Industrial espionage via the Internet.
11. Discovery and disclosure of business secrets obtained via the Internet.
12. Transferring databases without authorization.
13. Obtaining or transferring restricted personal information without authorization.
14. Investigating individuals in social networks, thereby violating their privacy.
15. Registering domain names using external corporate brands and names.
16. Money laundering through electronic or self-consumption transactions.
17. Child pornography.

Coral Homes Group has regulations that define staff duties and obligations in the use of corporate resources, as well as an Electronic Code of Conduct.

4 Excellence and professionalism

“At Coral Homes Group, we work rigorously and efficiently. Excellence is one of our fundamental values of the companies in our Group. As a result, we place the satisfaction of our customers and shareholders at the centre of our professional activity”

4.1 Customer service

Customers are at the centre of the Coral Homes Group activity. Through this commitment, the Group companies create value for their customers and for the environment in which they operate.

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Coral Homes companies is committed to a high level of honesty and professional responsibility in all its relations with customers.

The services and products offered by Coral Homes Group to its customers reach the market after being thoroughly studied and analysed. They must be sold in accordance with the established regulations and terms. Any complaints must be addressed quickly and seriously. In this respect, Coral Homes Group has procedures in operation to resolve any differences of opinion. In these instances, it is important to behave honestly and reasonably in order to resolve issues quickly and efficiently.

4.2 Commitment to shareholders

Coral Homes Group follows the highest standards and best practices of corporate governance, reporting compliance with recommendations for good governance.

The transparency with shareholders, the rigor of its investments, and the strength and professionalism with which Coral Homes Group works on a daily basis make it possible to constantly analyse and study new business opportunities and add value to its shareholders.

4.3 Professionalism and teamwork

Coral Homes Group most important assets are its employees and the values and principles that motivate them. Coral Homes Group appraises the capabilities and contributions of each person.

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

5 Guidelines for employees or partners who leave the Company and ongoing obligations

If the professional or business relationship between the Coral Homes Group companies and an employee and/or a partner ends, irrespective of the cause, all Coral Homes Group materials, resources, and work equipment that the employee and/or partner has in his or her possession at the time, directly or indirectly, as well as any documents, files, and reports (regardless of the medium) owned by Coral Homes Group and held by the employee and/or partner, either in the original form or as a copy, must be handed over to the employee's direct supervisor, or in the case of outside contractors, to the person at Coral Homes Group responsible for their hiring. The employee and/or outside contractor will have no right to remain in possession of such items, specifically no copy shall be kept, and any documents not returned must be destroyed, in particular those that contain sensitive information.

Employees and/or outside contractors accept that the results of the work they have carried out at the Coral Homes Group companies are owned by the Company (regardless of whether intellectual property rights apply). As a result, former employees and/or former outside contractors may not copy, reproduce, or transfer any item belonging of these companies, including, but not limited to, any studies, proposals, programs, lists, or inventories.

In addition, if the employee and/or outside contractors had been given a power of attorney to represent Coral Homes Group, the employee and/or outside contractors, upon request by Coral Homes Group,



must forthwith carry out the appropriate procedures to have such power of attorney revoked and cancelled. In any event, if a power of attorney remains in force after the work and/or contractual relationship has terminated, the former employee and/or former outside contractors shall in no way use the power of attorney and shall inform third parties that he or she is no longer authorized to act on behalf of Coral Homes Group. Any abuse or inappropriate use of such a power of attorney will result in Coral Homes Group taking the due legal actions, including criminal lawsuits if the actions are of an illicit nature.

Former employees and/or former outside contractors will remain bound to their duty of loyalty to Coral Homes Group, and specifically to their obligation of confidentiality and professional secrecy in respect of the sensitive and confidential information that came to their knowledge while working at or doing business with the Coral Homes Group companies.

Finally, if the Coral Homes Group companies and a former employee and/or former outside contractors included a post-contractual non-competition clause in the employment contract or the business contract, as the case may be, or in an addendum thereto, the former employee and/or former outside contractors must comply with such clause under the terms contained therein. Any breach of such clause will give these companies the right to take action to claim from the former employee and/or former outside contractors the full amount received on this account, as well as any damages resulting from the former employee's and/or former outside contractor's recurrent behaviour.

6 Penal Compliance Management System

Coral Homes Group spares no effort to prevent the commission of criminal acts to which the Group is exposed in the development of its activities.

The Individuals Subject to the Code must comply with the provisions contained in the *Compliance Policy* and in the *Penal Compliance Management System*, which include all the criminal risks to which it is subject, in accordance with article 31 bis of the Criminal Code.

The Criminal Compliance Management System also includes all relevant aspects that show the existence of an organizational and management model with suitable monitoring and control measures to prevent and, if appropriate, detect criminal activities within Coral Homes Group.

Additionally, the Company completes its control structure through the various audits carried out by Internal Auditing, as well as periodic audits and verifications by external experts.

Individuals at all levels within the Group Companies must ensure that the prevention and control measures included in this Management System are truly and effectively applied, so that this self-regulation system helps to eliminate behaviours that could put at risk the market reputation and the tangible and intangible assets of Coral Homes Group and of those forming it.

The Management System will be adapted to legal precedents and to amendments to the Criminal Code in relation to the criteria for accusing and to the prevention and control requirements regarding the criminal liability of legal entities. It will also be updated periodically.

7 Ethics Hotline

All the individuals who form part of Coral Homes Group are required to inform the Group Companies of any situation or behaviour that infringes on the ethical principles of this code or the regulations and legislation in force, as well as of any irregular situations of potential importance.

To this end, Coral Homes Group has established an Ethics Hotline for reporting activities that do not comply with Coral Homes Group ethical principles or any situation that might constitute a penal risk for the Company or weaknesses of the Penal Compliance Management System. The aim of the hotline is to address any claim made to that effect.

The Ethics Hotline is available via a web application at <https://lineaeticaservihabitat.i2ethics.com>, which may be accessed by employees, shareholders, executives, suppliers, customers and, in general, any third parties wishing to notify Coral Homes Group of irregular activities that could infringe on the ethical principles of this Code.

To monitor compliance with the *Penal Compliance Management System*, the Code of Ethics and the Ethics Hotline, Coral Homes Group has the Coral Homes Group Compliance Committee, with representatives from the Regulatory Compliance departments from each of the Group companies and, if appropriate, based on the Committee's agenda, from the People (Human Resources), Legal and Internal Audit departments, among others. The Committee is set up as a body for consideration, consultation and resolution of claims and dissemination of the Code of Ethics and the Ethics Hotline.

The Ethics Hotline is managed by an external provider in order to guarantee maximum confidentiality. Reports can be made anonymously.

No retaliation, discrimination or disciplinary action will be taken by the Coral Homes companies or any member of these Companies against those reporting in good faith and on the basis of reasonable suspicion.

8 Regulatory Compliance Mailbox

Coral Homes Group has a Regulatory Compliance mailbox: cumplimientonormativo@servihabitat.com, through which any doubt or concern related to the ethical principles in this code, the regulations or legislation in force, or the *Penal Compliance Management System*, can be communicated.

9 Penalties and Sanctioning Procedure

Non-compliance, by the Coral Homes Group employees, with the legal regulations, the Code of Ethics or the regulations that develop the Code shall be considered a breach and the rating of the breach and related disciplinary action shall be in accordance with the provisions contained in the Collective applicable to each of the Group companies.

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Disciplinary procedures will begin based on a report, a communication, as the result of an investigation or any other method used to inform the Coral Homes Group Compliance Committee of the alleged breach.

If the breach is committed by an individual holding a sensitive position, the breach can be rated as of a higher degree, at the discretion of the Coral Homes Group Compliance Committee.

A breach of the law, or of the Coral Homes Group Code of Ethics or the Group's regulations as applicable to the suppliers hired, shall be referred to the Coral Homes Group Compliance Committee, which will determine the appropriate disciplinary action depending on the breach committed.

10 Approval, monitoring and review

This Code was approved by the Board of Directors of Coral Homes Holdco, S.L.U. (as the Group's parent company) on 24 July 2019.

To guarantee the efficacy of this Code and any other internal regulations developing it, both the Code and the regulations will be periodically reviewed and updated.

Any material changes to the Code shall be submitted to the Board of Directors of Coral Homes Holdco, S.L.U., except minor changes or for simple development thereof. In these cases, approval by the Coral Homes Group Compliance Committee shall suffice.

In addition, the Coral Homes Group governing bodies will be informed of the application of this Code and any internal regulations that develop the Code on an annual basis.