

# Compliance Policy

# GRUPO

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This document constitutes the Compliance Policy (“the Policy”) 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”).

The Coral Homes Group expresses its firm commitment to comply with the legislation in force from time to time and its internal regulations, according to the ethical values defined therein. Therefore, it sets out this *Compliance Policy* (the ‘**Policy**’) and undertakes to encourage its implementation across the companies it is made up of and to provide the resources necessary to comply with it.

## PURPOSE AND SCOPE

The purpose of this Policy is to define the principles and commitments of the Coral Homes Group in terms of Compliance or Regulatory Compliance.

This Policy is set out and approved according to the provisions of the Code of Ethics of the Coral Homes Group, by way of which, among others, the Group undertakes its commitment concerning Compliance to observe the legislation and the regulatory obligations in force from time to time, as well as its internal regulations, which shall be based on ethical criteria in accordance with the Group’s values and principles.

## VALUES AND PRINCIPLES

The Coral Homes Group is governed by the following values and principles:

- **Integrity and transparency.** The trust of its clients, partners 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 integrity and transparency are beyond question. Therefore, the Coral Homes Group opts for integrity and transparency towards society as the key values of its actions.
- **Excellence and Professionalism.** Excellence and a thorough, effective and professional work are the hallmarks of the Coral Homes Group. Therefore, the satisfaction of its clients and partners is at the core of the Group’s professional activity.
- **Respect.** Respect for people and their dignity is at the heart of the Coral Homes Group actions, as well as respect for the environment. The Group undertakes to protect and preserve the environment, observing the regulations in force in this regard at all times and implementing processes to reduce the environmental impact of its activities.
- **Confidentiality.** The confidentiality of the information regarding the clients and shareholders of the Coral Homes Group is the main pillar of the relationship of trust that drives the activity of the Coral Homes Group.

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## COMMITMENTS

In order to implement its values and principles, the Coral Homes Group sets out the following commitments in terms of Compliance:

- Commitment to ensure that the Group acts in accordance with the provisions of its Code of Ethics and of the legislation in force from time to time, and prevent an improper behaviour or contrary to this Policy, to ethics or to the Group's internal policies and rules, by the Group's directors, executives and employees while exercising their duties or by third parties acting on behalf of the Group.
- Encourage a zero-tolerance policy regarding behaviour which may involve a breach of the legislation in force from time to time or of the Group's internal rules and processes, particularly regarding the criminal liability to which the Group is exposed within the scope of its activity.
- Commitment to create an environment where the risks of fraud and corruption are minimised to avoid the losses they cause.
- Commitment to protect the confidentiality, integrity and availability of the information, and respect and protect the privacy of those who provide personal details or confidential information to the Group within the framework of their relationship.
- Commitment to develop and preserve a risk management system, including the implementation of controls, rules and processes, and the ongoing assessment thereof.
- Develop a corporate Compliance system in accordance with the needs of the Group.
- Commitment to ensure the authority and independence of the Group's Compliance Committee.
- Commitment to manage the Ethical Line as a channel to report suspicious facts or behaviour relating to criminal liability and ensure that there will be no retaliation against the whistleblower.
- Commitment to give training and raise awareness across the Group concerning the internal Compliance system and rules. The Group's directors and executives shall have a key role in this regard, including, within the scope of their duties and where applicable, third parties related to the Group.

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## Approval, follow-up and review

This Policy has been approved by the Board of Directors of Coral Homes Holdco, S.L.U. (as the parent company of the Group) on 24 July 2019.

In order to ensure the effectiveness of this Policy and other internal regulations implementing it, these provisions shall be regularly reviewed and updated.

All significant amendments of the Policy shall be subject to the approval of the Board of Directors of Coral Homes Holdco, S.L.U., except for those of a clerical or developmental nature, which will only require the approval of the Compliance Committee of the Coral Homes Group.

Likewise, the governing bodies of the Coral Homes Group will be informed every year about the implementation of this Policy and the internal regulations implementing it.