

MOLINS

Defensa Penal

— Code of Ethics

Molins Defensa Penal is a *boutique* of Criminal Law and Compliance reference in Spain, with a track record of over 25 years, guaranteed by the prestige of its partners Pablo Molins, Jorge Navarro and Jordi Pina and the expertise and technical solvency of its new partners and professionals, which has led them to intervene in major criminal cases in the Spanish judicial history of recent times.

The Firm has highly specialized and first class teams, composed of lawyers, academics, researchers, computer scientists and other staff professionals, with well-defined structures to provide maximum value to the Client and advise on all types of criminal matters such as crimes in the field of corporate economic and business law, tax crimes, corruption offences, crimes related to Public Administration or Compliance.

The Firm has offices in Barcelona and Madrid and provides advice in all criminal instances of the national territory. It has strategic alliances of trust, independent and non-exclusive, with both national and international firms.

Contents

1. Letter from the partners	3
2. Mission and values	5
Our mission	5
Our values	5
3. Purpose of the Code of Ethics.....	3
4. Scope of the Code of Ethics.....	3
5. Our commitments	4
Commitment to legality and values	5
Commitment of the partners of Molins Defensa Penal	5
Commitment to the Firm and its members.....	6
Commitment to third parties.....	7
Commitments in relation to the activity of Molins Defensa Penal	8

1. Letter from the partners

Molins Defensa Penal aspires to ensure that its conduct and the conduct of the members of the Firm, in addition to complying with current legislation, is in line with ethical principles and social responsibility. Therefore, this Code of Ethics reflects the Firm's commitment to the principles of responsible business ethics, establishing a set of principles and guidelines for action with which it intends to ensure socially responsible behaviour.

The principles and guidelines of conduct contained in this Code of Ethics are applicable to all professionals and collaborators of the Firm, regardless of the position they hold and their geographical or functional location.

The Board of Directors of Molins Defensa Penal, committed to ethical and regulatory compliance, is responsible for promoting and ensuring that all its members respect the provisions of this Code. To this end, it is considered absolutely necessary that all members of Molins Defensa Penal read this document carefully and, in addition, internalise the principles and guidelines contained therein.

The partners of Molins Defensa Penal,
Pablo Molins, Jorge Navarro and Jordi Pina



2. Mission and values



Our mission

Our main mission as professionals specialized in criminal law and compliance is to advise and defend the interests of our clients with the utmost **diligence, thoroughness, confidentiality and commitment**. With this, the team that forms Molins Defensa Penal strives to always provide advice and defence of the highest quality to individuals or companies that seek our services.

Our values

The function of Molins Defensa Penal cannot be understood without taking into account the deep respect for a series of values that guide and inspire any of our actions.

The **main values** that characterize and inspire our way of being and doing are as follows:

Attention to individuals

Our work is to provide advice and criminal legal defense to individuals (**individuals and legal entities**) and compliance services. That is why each one of the professionals who are part of the Molins Defensa Penal team, offer personalized attention to clients who require our services.

Trust

At Molins Defensa Penal the **relationship between the client and the lawyer** is based on trust. We believe that the key to this relationship of trust lies both in the professional quality of our services and in the human quality of all the members of Molins Defensa Penal.

Continuous improvement

At Molins Defensa Penal we are firmly committed to **selection, tutoring and specialization** as key points to guarantee our professional quality and the efficiency of our services. To this extent, we are a group of professionals specialised in criminal law and compliance who do not conform. Therefore, in Molins Defensa Penal we believe that continuous improvement requires a good training of each of us, always seeking to be **updated**.

Teamwork and companionship

Teamwork and dedication is a fundamental aspect in Molins Defensa Penal. To this end, the **collaboration** between the different professionals who are part of the firm is not only a way to generate synergies of companionship, but also to provide a better professional and human treatment to our clients.

Confidentiality

The provision of our services is governed by total confidentiality and by the capacity for discretion, prudence, privacy and anonymity of all our professionals, thus respecting the fundamental principle of professional secrecy.

Responsibility

Our team of professionals assumes this commitment on a daily basis, always seeking the **collective benefit and maximum transparency** in their actions. The development of responsible conduct is not only manifested from the perspective of providing a service of the highest quality, but also from the selection of the matters in which the Firm intervenes. To this extent, Molins Defensa Penal also intervenes in matters related to the defence of Human Rights.

3. Purpose of the Code of Ethics

Through this Code of Ethics, at Molins Defensa Penal we show our willingness and commitment to do things right, being a valuable tool to help us make the best decisions for the Firm.

Therefore, the purpose of this Code of Ethics is to establish the general criteria of conduct that guide the professional performance of our activity.

Specifically, all members of Molins Defensa Penal guide our actions on the basis of the following guidelines for action:

#1 We are aware of the content of this Code of Ethics and we are committed to comply with it, this being one of our fundamental labour obligations.

#2 We are familiar with the regulations that apply to our professional activity.

#3 We are familiar with the policies and protocols that implement a corporate culture in accordance with the law, especially criminal law.

#4 We participate in all the training activities organized by the Firm.



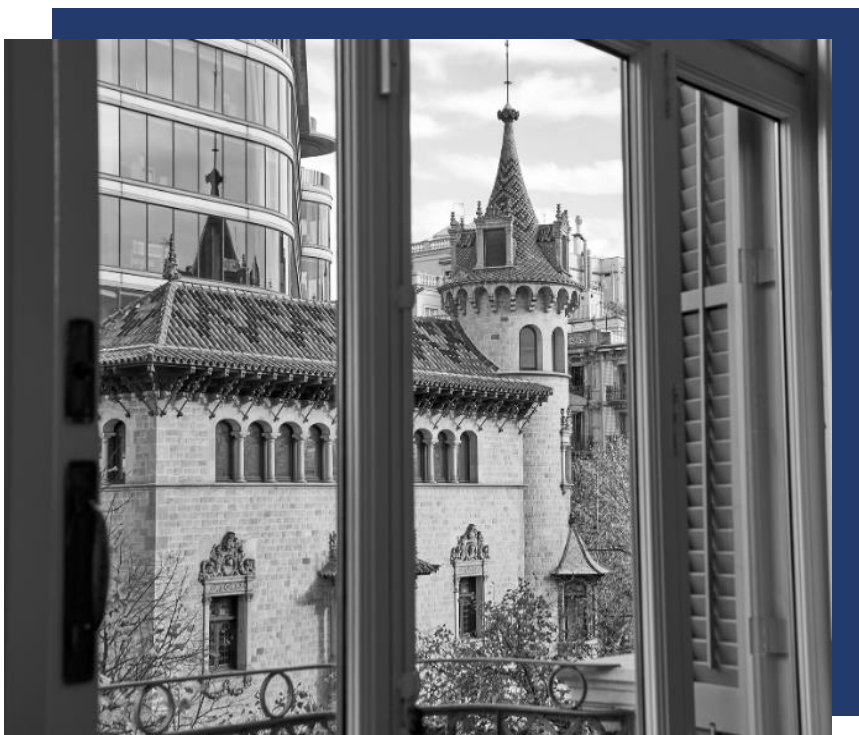
4. Scope of the Code of Ethics

The **guidelines of conduct of this Code of Ethics** are configured as mandatory guidelines for all members of Molins Defensa Penal and, to this extent, they **bind us all equally**. Specifically, this Code of Ethics applies to the following people:

#1 To the partners of Molins Defensa Penal.

#2 To all the employees and professionals who work at Molins Defensa Penal.

To this end, the partners of Molins Defensa Penal ensure that every one of the Firm's employees and professionals read and understand the contents of this document.



5. Our commitments

Commitment to legality and values

The professional activities of Molins Defensa Penal are carried out in **strict compliance with current legislation**. In addition, Molins Defensa Penal also expresses its **commitment to ethical conduct** in the provision of its services. For this reason, all our members refrain from any action, which, although it may be in accordance with current legislation, could be considered reprehensible from an ethical or deontological perspective.

In addition, all members of the firm are committed to carrying out their duties with integrity, treating all those who come into contact with Molins Defensa Penal with professionalism and respect.



Commitment of the partners of Molins Defensa Penal

The partners of Molins Defensa Penal are committed to providing all the means and resources necessary to disseminate, promote and encourage the principles and values set out in this Code of Ethics. In addition, they set an example in their behaviour, setting a high level of demand in compliance with this Code and other standards of ethical and regulatory compliance.

To this end, the partners of Molins Defensa Penal undertake the following actions:

- #1 To train all employees and professionals of the Firm in the importance of ethical behaviour and compliance with regulations.
- #2 Implement the necessary mechanisms to prevent unethical and unlawful behaviour.
- #3 Provide all necessary means to disseminate the values of Molins Defensa Penal and enforce compliance with the guidelines of this Code of Ethics.
- #4 React appropriately to cases of non-compliance with this Code of Ethics.

Commitment to the Firm and its members

Respectful treatment and non-discrimination

Molins Defensa Penal undertakes to maintain a **working environment free of any discrimination and of any conduct** linked to a situation of **harassment** in any of its manifestations.

At Molins Defensa Penal **we do not tolerate abusive, hostile or offensive behaviour**, whether verbal or physical.

Equal opportunities

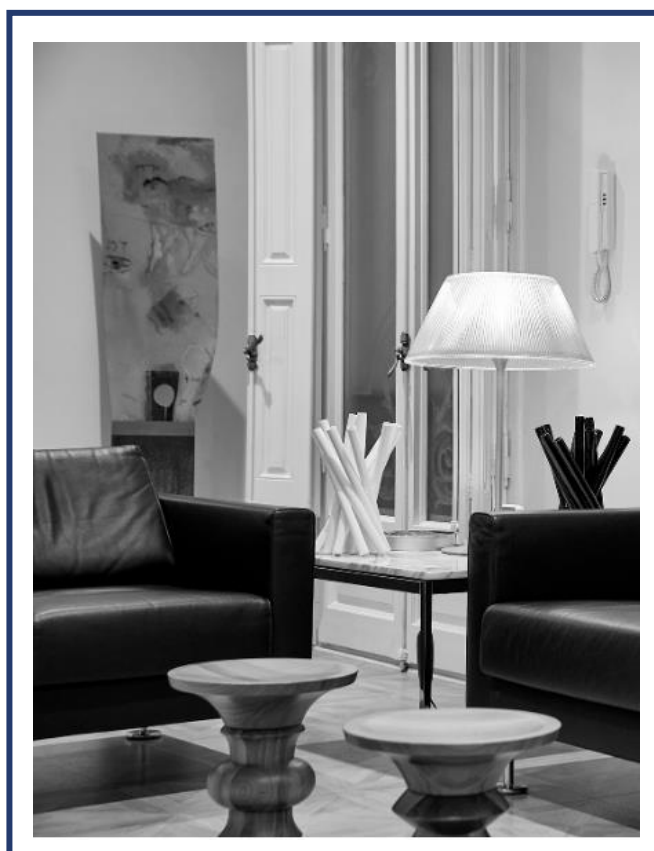
At Molins Defensa Penal we have a professional development plan which, among other aspects, manifests an effective **policy of equal opportunities** for all our professionals to develop their professional activity on the basis of the **principle of merit**. Thus, promotion decisions are based on objective assessment criteria.

Health and safety at work

At Molins Defensa Penal we provide a safe and stable working environment. To this end, we provide **regular training in the occupational risk prevention**. We also keep the occupational risk prevention measures up to date.

Money laundering

At Molins Defensa Penal we are aware of the importance of complying with all current regulations on the prevention of money laundering and the financing of terrorism. To this end, we not only carry out training activities, but we also have internal prevention protocols and policies in this area.



Commitment to third parties

With our clients

At Molins Defensa Penal, the client is the main focus of our activity. For this reason, we are committed to providing a quality service with the highest possible professionalism. To this end, at Molins Defensa Penal we are committed to constant communication with our clients, being aware of their needs and always trying to exceed the expectations that the client places in us.

With the market

Molins Defensa Penal's commitment to compliance also extends to free competition regulations, thus avoiding any practice that limits or restricts competition.

At Molins Defensa Penal we are concerned with offering truthful information in the promotional activities we carry out, without tolerating the offering of false information to our clients. Therefore, through this Code of Ethics we categorically reject the following:

#1 Engaging in any type of misleading advertising through the Firm's media.

#2 Discovering, disclosing, releasing or disseminating sensitive or proprietary information to which our members have access.

With partners and suppliers of services and products

In its relationship with external collaborators and suppliers, Molins Defensa Penal is based on the **principles of trust, loyalty, transparency, reciprocal collaboration and confidentiality**. Molins Defensa Penal undertakes to make this Code of Ethics available to its collaborators so that its provisions are not contravened. Similarly, we expect our suppliers to comply with the legal requirements applicable to their business relations.

With the public administration

In our relations with members of any Public Administration, all the members of Molins Defensa Penal faithfully respect the provisions of the regulations in force and the internal regulations of the organisation. In this sense, we **adhere to the principle of transparency**. Thus, contacts with the institutional representatives of any public administration are carried out by the representatives of Molins Defensa Penal designated for this purpose, who are accountable for the outcome of the meetings and negotiations.

Likewise, through this Code of Ethics, Molins Defensa Penal declares its absolute rejection of any practice linked to corruption in its relations with any member or representative of public administrations. Specifically, it is forbidden to offer, receive, request or accept an unjustified benefit or advantage of any kind in the contracting of services and/or in other commercial relations.

In the event that any of our collaborators or external suppliers adopt behaviour that does not comply with the law, Molins Defensa Penal may take the appropriate measures and may even refuse to collaborate in the future.

Molins Defensa Penal is prohibited from authorising the offering, either directly or indirectly, of anything of value to any supplier to obtain an undue advantage in the procurement.

With the environment

At Molins Defensa Penal we are aware of the importance of developing a sustainable and environmentally friendly activity.

Although the activity of Molins Defensa Penal does not constitute a high-risk activity for the environment, in our day-to-day work we adopt environmentally friendly conduct. Thus, among others, we have policies relating to recycling and *paperless*.



Commitments in relation to the activity of Molins Defensa Penal

Confidential information

We all have an obligation to protect the information we hold in relation to Molins Defensa Penal, as well as information relating to our customers and suppliers.

All members of Molins Defensa Penal must keep confidential all reserved and sensitive information to which we have access. Furthermore, we must preserve it so that it cannot be used inappropriately and refrain from using it improperly for our own benefit or that of third parties. This confidentiality includes friends and family members.

We also respect the information of our clients and collaborators and abide by the principles of confidentiality and privacy.

How we communicate information is key to us and our reputation, so we must all communicate it truthfully and under no circumstances provide incorrect, inaccurate or incomplete information that could mislead the recipient.

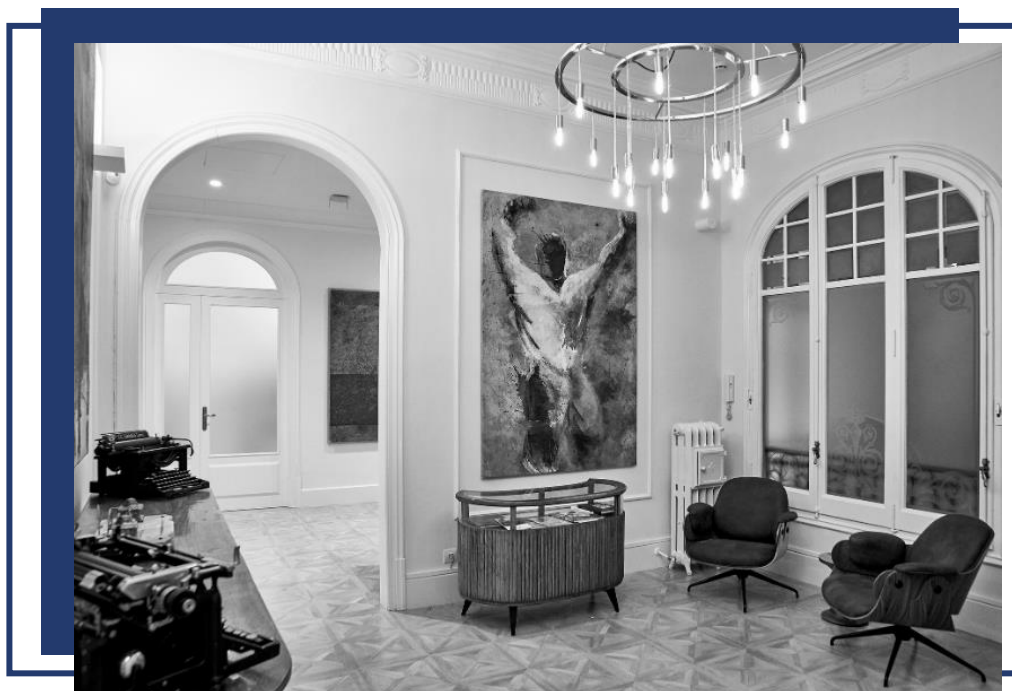
Use of resources

Molins Defensa Penal provides its employees with the resources they need to carry out their professional activity. To this extent, all the members of the Firm are aware of the need to care for and protect the resources of the entity, as well as their correct use. For this reason, all the members of Molins Defensa Penal are committed to making rational use of them.

Information and knowledge processing

Molins Defensa Penal declares the truthfulness of the information as a basic principle in all its actions. In particular, all economic transactions of Molins Defensa Penal must be clearly and accurately reflected in the corresponding records, as well as all operations carried out and expenses incurred.

Similarly, the economic and financial information shall faithfully reflect its economic, financial and equity reality, in accordance with generally accepted accounting principles and international financial reporting standards.



www.molins.eu

MOLINS

Defensa Penal