

## Code of Conduct and Professional Ethics

### Applicability

The following Code of Conduct and Professional Ethics applies to the **society 'Real Club Celta de Vigo', SAD, to the 'A Fundación' and society 'Afouteza e Corazón SL'** (hereinafter we will refer to the 3 societies as "Club"), and binds all their employees, directors, and members of the administrative bodies, as well as the football players who are part of the team Celta de Vigo, Cantera and the partners that are not included in the staff of the RC Celta Group.

This Code has been endorsed by the Management Board, and its compliance is supervised by the Supervision and Control Body, intended for this purpose. Its enforceability will be extended, by contractual means, to the subcontracted companies and employees that provide services to the Club.

### Principles and values of the Club

Everyone who forms part of the Club has to understand and meet the expectations in terms of how to act in the work environment and in the business sector.

The image of the Club is a result of a collective effort, based on dedication and work over the years. Therefore all the members of the Club are responsible of **maintaining and improving its image of trust**, credibility and loyalty among the followers. This task is fundamental to continue on the path of excellence and to exert a positive influence on the community it's taking place.

The Club bases its decisions and actions on the main values of **honesty, justice and integrity**:

The basic guiding principles of the activity of the Club are:

- Strict compliance with the law and internal regulations.
- Utter respect, equity and dignity treating with employees, players, collaborators, partners, suppliers, competitors and third parties related with the Society.
- Commitment to health and safety.
- Transparency, objectivity and professionalism in all their activities and the relations with all groups of interest.
- Privacy, data protection and confidential information.
- Promotion of the sporting activity with the highest professional standards.

These principles have to be known and respected by all employees and partners of the Club, internalizing and reflecting them in all their actions

### Code of Conduct and Professional Ethics

The Code of Conduct and Professional Ethics of the Club arises from the values and principles mentioned previously, and which constitute the basic reference that all the employees and partners of the Club to follow.

This Code doesn't cover all the possible situations that may occur in the professional field, neither does it substitute the individual responsibility to use common sense and good judgement.

The reflected conduct in the Code are with **obligatory compliance** for all the staff, while the performance of their professional activity in the Club, and it also has to be fulfilled by reporting any infringements by others, if necessary.

Such conducts will be carried out, not only by employees, but also by collaborators, partners, sponsors, competitors, suppliers and third parties related to the Club.

In the event of a doubt regarding the implementation of the Code, you shall request clarification to the Club Management.

#### Fundamental principles of the Ethical Code:

##### **1. Strict compliance with the law and internal regulations**

The Law must be complied with and complied with, as well as the internal regulations imposed by the Club. Illegal practices or non-compliance with regulations in the Club environment are not tolerated, so it must be reported appropriately when they are detected. For this, among other things, the Whistleblower Channel is made available to all employees and collaborators as a tool for its treatment, ensuring total confidentiality.

The procedures and policies that are in force must be followed, and in case of identifying needs for changes or improvements, they may be proposed to the corresponding person in charge.

Retaliation of any kind against employees or third parties, who denounce an illegal practice, infringement, or non-compliance with the regulations, will not be tolerated.

##### **2. Maximum respect, equity and dignity in the treatment of all employees, players, collaborators, partners, suppliers, competitors and other third parties related to the Company.**

All the employees and collaborators of the Club are committed to creating a dignified, safe and professional work environment that supports and respects people, their rights, their dignity, their personal conditions, and that fosters mutual respect and collaboration.

Offensive, intimidating, discriminatory, malicious, humiliating or disparaging behavior, harassment, etc., are not allowed and will be reported, if applicable, towards employees or third parties related to the Club. All individuals and entities will be treated without discrimination and with objectivity, and it is prohibited to provide privileged information and favorable treatment to any of them.

The Club undertakes to develop training plans to ensure the proper training of all employees, and to specify the tasks and objectives for each of them.

There will be no public or even private events or performances that threaten the good image and prestige of the Club.

### **3. Commitment to health and safety.**

The Club will establish the action plans that are necessary to adequately manage and mitigate the risks associated with its activity. These plans will be reviewed periodically and the necessary resources will be provided for their maintenance and improvement.

The prevention of accidents and the assurance of safety in the development of the activity will go in parallel to the activity of the Club.

Employees and collaborators will be trained for the proper development of their tasks, prioritizing safety in all areas. They will also be provided with all the necessary resources to guarantee said security.

### **4. Transparency, objectivity and professionalism in the development of all its activities and relations with stakeholders.**

The Club as an entity, its employees, players, collaborators, managers and members of the administrative bodies, will base their internal relationships, and with third parties, on ethics, honesty, professionalism and transparency:

The Club does not allow falsification, concealment or simulation of data, accounting entries and operations, double counting that are intended to avoid any payment or obtain illicit benefits, to the detriment of the Public Treasury or Social Security.

The accounting of the contracted operations will be carried out with accuracy and rigor and the required files and records will be maintained with equal criteria. The staff responsible for accounting is obliged to prepare accounting information in accordance with the true image of the assets and the financial situation of the Club.

It will facilitate legitimate and honest competition, avoiding harm in any way to competing individuals or entities.

Relations with suppliers and sponsors, or with any type of supplier, contractor or collaborator, will be guided by impartiality and objectivity, applying rigorous criteria of adequacy, quality, efficiency and cost.

No employee, player, collaborator, manager or member of the administrative bodies will accept gifts, invitations, gifts, services or favors that may affect their professionalism, objectivity and / or impartiality in their professional relationships, which lead to the generation of a commitment or return of a favor, within the scope of the Club and its surroundings, and / or involving fraud, illegality, unethical practices or harm to third parties.

In the same way, gifts, invitations, gifts, services or favors will not be offered to individuals or institutions, which may affect the objectivity and / or impartiality of these in their commercial or professional relationships, which lead to the generation of a commitment or return of a favor, within the scope of the Company and its environment, and / or involving fraud, illegality, unethical practices or harm to third parties.

Expressly, it is forbidden to participate in "acts", that is, to promise, offer or grant benefits or advantages of any nature, not justified, to predetermine or deliberately and

fraudulently alter the outcome of a match. In the same way and in the opposite direction, it is prohibited to receive, request or accept said benefits or advantages.

The Club as an entity, and all its employees, players, managers and members of the administrative bodies, will collaborate with the authorities, the justice system, the regulatory public entities and other public entities, in a correct and diligent manner, without impediments, obstacles nor generating errors or omissions, and facilitating their work in whatever relationships they have with them, and informing them of all the information that is timely and / or mandatory.

All employees, players, collaborators, executives and members of the Company's administrative bodies will carry out their work with quality, diligence, professionalism, transparency, honesty, trying to add value, improving efficiency, making risks, deficiencies and / or improvements, innovating, making rational and appropriate use of all resources, and safeguarding the assets of the Company.

In order to avoid conflicts of interest, employees, players, collaborators, executives and members of the Company's administrative bodies, will not have any economic or any type of interest, nor will they carry out activities with companies or institutions related to the Club. If such a circumstance occurs, it must contact the Directorate to be evaluated together with the legal adviser, and take the necessary measures if deemed appropriate.

It is prohibited, on account of an individual's position in the Club, the use of his resources, powers, influence or other facilities, for his own benefit or that of his immediate environment. It is also strictly prohibited for an individual or entity to act in the name or on behalf of the Club without prior consent, as well as to use said name, means, relations with third parties, position or influence of the latter for their own benefit or that of their immediate environment.

## **5. Privacy, data protection and confidential information.**

The Club will respect the right to privacy of its employees, players and collaborators. The request and the processing of personal data will be limited to that information essential for the normal activity of the Club and for the punctual compliance with the applicable regulations.

The Club will adopt the necessary measures to preserve the confidentiality of the personal data it has and to guarantee that its treatment and the exercise of the rights of access, rectification, cancellation and opposition is carried out in accordance with the legislation in force on this matter.

The Club will protect the Intellectual and Industrial Property from third parties.

Employees who, due to the performance of their professional activity, have access to information of other employees will respect and promote the confidentiality of this information and will make a responsible and professional use of it.

The activity of the Club can generate commercial and sports-related knowledge and information, the value of which resides largely in your reservation. Club employees will make discreet and professional use of the information to which they have access and will keep confidentiality about the content of their work.

In any case, they will refrain from using for their own benefit information, data or documents obtained in the course of their activity.

## **6. Promotion of sports activity with the highest standards of professionalism.**

The main objective of the Club is to achieve sports success, but it is necessary to act with practices and behaviors that dignify it, its image and the values it represents.

In the same way, efforts will be made to assert the loyalty of the partners, ensuring their interests. The players, collaborators, and in general, the sports personnel, will attend to some clear principles:

**Loyalty and service to the Club:** any action of an individual related to the Club, must be directed, solely and exclusively, to look after the interests of the Club. The dissemination of news that may harm the good name and good image of the Club should be avoided.

**Participation and communication:** an attitude of information will be promoted, based on the transparency of all decisions and actions. The participation of the partners will be promoted, as far as possible, according to the nature of each matter.

**Pluralism:** pluralism will be preserved and respected, preventing the Club's policies and actions from being exclusive.

**Honesty and austerity:** the individuals who are part of the Club must seek the conservation of a patrimony that belongs to the members. Austerity will preside over the management of the Club at all times and will apply to all social and economic activities of the Club.

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***Once read, I hereby declare that:***

***- I promise to respect and comply with all its provisions.  
- I agree to communicate any action contrary to the Code of Conduct of which I had knowledge through the email address***

canaldenuncias@rccelta.es

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