

SOS YACHTING OF SPAIN S.L. CODE OF ETHICS

Introduction

The Code of Ethical Conduct is our guide to proper conduct, together with the established work rules and procedures, to ensure that what is correct and that in its logical consequence no crime occurs in the company.

The Code is a guide for all employees of **SOS YACHTING OF SPAIN S.L.** in their professional performance in relation to their daily work, the resources used and the business environment in which they operate. It provides guidelines that clarify the basic principles of all management and interpersonal relationships with colleagues, collaborators, bosses, suppliers, customers, shareholders and, in general, anyone with a direct or indirect interest in the company's activity. Our actions are based on respect for our corporate values, and employees and managers will adapt our actions to principles of behaviour that are respectful of business ethics and professionalism, with the aim of making it a benchmark in these terms and thus being recognized.

Scope of application

This Code is addressed to all employees and managers of **SOS YACHTING OF SPAIN S.L.** regardless of the type of contract that determines their employment relationship, the position they hold or the place where they carry out their work. There is an obligation for those related to the company to inform their main suppliers of the existence of this Code, which will be available for consultation on the company's website <https://www.sosyachting.com/spain>

Values

Our values represent our identity as a collective. We are different because the people who work at **SOS YACHTING OF SPAIN S.L.** We make this company a unique and differentiating project. We are fast, we know how to listen, we seek innovation, we are helpful and we work as a team in a rigorous and transparent way.

- We make quick decisions and act quickly and dynamically.
- We focus in an agile way on the solution to a problem by proposing realistic, quality and viable alternatives.
- We adapt quickly to the changes and demands of the professional environment.
- We listen carefully to our internal and external customers in order to know exactly their needs and propose appropriate solutions.
- We have the eyes and ears of the customer in any operation we develop, continuously asking ourselves for their satisfaction.
- We listen actively, with an open attitude and respect for the opinion of all parties involved in a situation.
- We actively look for opportunities to improve products and services and create new business opportunities.
- We take advantage of opportunities and problems to provide innovative solutions.
- We are constantly updating our technological know-how in order to be pioneers in innovation.
- We know the needs and expectations of our customers in order to develop and implement solutions that increase their satisfaction.
- We serve our clients efficiently, maintaining at all times an agile and decisive behavior that enhances the credibility and reputation of the company and its professionals.
- We serve clients with the utmost interest and strive to interpret their demands, this being the priority characteristic of the attitude of all our professionals.

- We know how to work in multidisciplinary teams, from different units, companies and countries, generating a climate of trust and mutual respect.
- We cooperate with the rest of the organization by making commitments aimed at achieving common goals.
- We orient our efforts towards the same result, taking into account the contribution of each of the members, no matter how small it may seem.
 - We respect differences, opinions, and diversity.
 - We are respectful of the environment and sustainability policies.

Principles of Ethical Behavior

The ethical behavior that governs this company is mainly based on:

Good faith

We adjust our actions at all times to the principles of loyalty and good faith with the company, with superiors, colleagues and collaborators with whom we interact. We emphasize the desire to achieve and the spirit of self-improvement. The concern to achieve the objectives set must be constant and continuous. We promote optimistic versus pessimistic attitudes. We subordinate personal objectives to the general objectives of the Company. We ensure that there is no conflict between the two, and we act in a way that prioritises the interests of the company over personal interests or those of third parties. We do not engage in outside interests that divert our time and attention from our responsibilities to our clients.

Honesty

All employees of **SOS YACHTING OF SPAIN S.L.** we undertake to declare any personal or professional relationship that could condition our behavior as employees of the Company. In addition, as employees of **SOS YACHTING OF SPAIN S.L.**, we do not accept undue compensation or advantage. We inculcate honesty and professional ethics in the usual commercial and professional relationships in the performance of our work, both in the private sector and in our relations with Public Administrations. We do not offer gifts, nor do we promise undue favored treatment to third parties, whether public or private, in order to gain an advantage. We promote trust in declaring the gifts or advantages that we may obtain from third parties and make them available to the company. Any personal or professional relationship that affects the interests of the Company is communicated to the immediate manager. We do not allow personal or family relationships in direct dependency within the same organizational unit.

We avoid conduct that is contrary to free competition, or that involves an act of unfair competition. In advertising campaigns, we provide information in a clear and truthful way.

Respect

Each and every one of us is responsible for generating an atmosphere of cordiality and kindness in our environment. We promote respect and trust between people. We value diversity in opinions, training and culture as a source of knowledge and competitive advantage. We take care of the language we use when talking about third parties and we encourage the non-existence of defamatory guidelines and comments inside and outside the organization. We promote respect for real equality of opportunities between men and women, avoiding any scenario of direct or indirect discrimination. No person employed by **SOS YACHTING OF SPAIN S.L.** They are discriminated against in the professional sphere because of race, physical disability, religion, age, nationality, sexual orientation, sex, political opinion or social origin. We maintain a work environment free of all discrimination and any conduct that involves harassment of a personal nature, not admitting any form of physical, sexual, psychological or verbal harassment or abuse. We respect the environment and collaborate with the sustainable development of society.

Confidentiality

We refrain from providing, internally or externally, confidential data about the people and/or activities carried out in the Company. We provide, however, the data that is necessary for other employees of **SOS YACHTING OF SPAIN S.L.** perform their function correctly, with strict respect for this duty of confidentiality, principles of ethical behavior, respect, confidentiality and use of information. We comply with the regulations on the protection of personal data in relation

to which we have access due to our job. Employees of **SOS YACHTING OF SPAIN S.L.** We are characterized by a marked proactive attitude in the treatment of confidential information. The information is the property of the Company and should be shared whenever it is beneficial and necessary for the Company. In our conduct:

We provide those responsible with truthful, necessary, complete and timely information about the progress of the activities in our area; and to our colleagues, that which is necessary for the proper performance of their duties.

We maintain the professional secrecy of the data, reports, accounts, balance sheets, strategic plans and other activities of **SOS YACHTING OF SPAIN S.L.** and their persons, which are not of a public nature, and whose publicity may affect the interests of the company. We will not provide information about them, except where we are expressly authorized to do so.

We obtain information from third parties in an ethical and legitimate way, rejecting any information obtained improperly or that involves a violation of company secrecy or confidentiality.

In the event that we have doubts about the proper processing of the information, we request the assessment of our responsible party regarding the correct cataloguing of the information.

We may not use for our own purposes, those of third parties, or for profit or profit, the programs, computer systems, manuals, videos, courses, studies, reports, etc., created, developed or perfected in **SOS YACHTING OF SPAIN S.L.** since the company retains the intellectual property of these at all times.

In general, we maintain the strictest confidentiality in the use of internal knowledge outside the scope of the company, preserving our know-how.

We will only use the computer systems, software, material, reports, etc. of which **SOS YACHTING OF SPAIN S.L.** has acquired the corresponding license, respecting at all times their intellectual and industrial property.

The use of computer equipment is subject to the information security policy of **SOS YACHTING OF SPAIN S.L.** with the aim of avoiding damage to third parties and/or to the company itself.

We will not use access to the systems to act fraudulently or for our own benefit.

Decalogue of questions before making a decision

Asking yourself these questions will help you decide on what to do.

- Is it against work standards?
- Does that seem to be the right thing to do?
- Is it legal?
- Will it have a negative effect on my reputation or the company's reputation?
- Who else can be affected by this (other people in the entity, customers, suppliers)?
- Would I be ashamed if others knew that I had resolved to act this way?
- Is there an alternative solution that does not pose an ethical conflict?
- What would I look like if it were published in the newspapers?
- What would a reasonable person think?
- Will I be able to sleep peacefully?

Principles of Professional Behavior

Passion for the customer

All employees aspire to offer our customers a product of the highest quality and to have an excellent level of service. Excellence and quality of service are constant guidelines for action, promoting a healthy concern for continuous improvement. The resources provided by the company seek to promote innovation and the development of services to customers, with

profitability criteria. All of us, regardless of the functional area in which we work, are committed to the satisfaction of our customers. We promote honest attitudes towards the customer.

Efficient management

Employees of **SOS YACHTING OF SPAIN S.L.** We work efficiently during the working day, making the most of the time and resources that the company makes available to us in a rigorous and rational way. We all give the dedication required to carry out our duties, aspiring to achieve results in the optimal and productive way possible. The Company makes available to us all the necessary resources to perform the work and improve performance through an optimization of time and scope to the information necessary to fulfill our responsibilities. For this reason, we must make an appropriate and reasonable use according to the professional needs of each one. We do not engage in personal activities during business hours that interfere with or prevent you from fulfilling job responsibilities.

We use e-mail, internet access and, in general, the Company's computer systems for exclusively business purposes and purposes, and their use for personal use is expressly prohibited. We expressly authorize the Company to control the use of these. Unacceptable use of the Company's communications systems includes processing, sending, retrieving, accessing, viewing, storing, printing, or otherwise disseminating materials and information that is fraudulent, harassing, threatening, unlawful, racially, sexist, obscene, intimidating, defamatory, or otherwise inconsistent with professional conduct. In terms of occupational safety and health, we will comply with preventive measures, using the individual and collective means of protection that the company has at its disposal. In the case of having a team under their responsibility, those responsible will ensure that the members of that team carry out their activity in safe conditions.

Team Attitude

The company's employees will encourage teamwork and recognize the contribution of others in obtaining common results. As members of a team, we contribute with equal commitment both inside and outside our area. The attitude of teamwork predominates and stands out over any performance at the individual level. An outstanding individual is also an outstanding individual because of his ability to work in a team, and therefore there is no conflict between this behavior and that of being excellent individually. Individual interest does not take precedence over the interest of the team. We avoid passive attitudes: we don't get carried away and we don't stay on the sidelines. We encourage enthusiasm and commitment to the group and therefore to the organization. We act in a spirit of cooperation, making available to the other areas and departments of the entity the knowledge and resources that facilitate the achievement of the company's objectives.

Taking care of your reputation

We consider the company's image and reputation as one of its most valuable assets to maintain the trust of its customers. We ensure that the corporate image and reputation are respected and correctly used by all people in the company's environment. The brand image is visually reflected with our company logo, of which there are rules of use that protect its use and that we must respect. We are especially careful in any public intervention, having to have the necessary authorization to intervene before the media, participate in professional conferences or seminars and in any public media, provided that they appear as employees of **SOS YACHTING OF SPAIN S.L.** tags. We are all part of the corporate image and therefore we assume an ethical and responsible conduct that allows us to preserve the image and reputation of the company. At no time will we act by revealing behaviors that may damage the image. Our way of communicating, behaving and our own personal image will be in line with the professional context in which we operate.

Professional Development

Our professional growth and that of our teams is our key to being competitive. Employees are responsible for their professional growth, and consequently it is our duty to be permanently updated with the knowledge and techniques necessary for the efficient performance of our work. People with teams in charge must pay attention to the motivation and professional development of their collaborators, committing to provide them with development opportunities based on merit and their professional contribution. To this end, they will encourage their

continuous learning, recognize their efforts in a specific way and objectively assess their achievements, drawing up the necessary action and support plans for their development.

Internal information system (ethics or whistleblowing channel)

In compliance with the provisions of article 25 of Law 2/2023, of February 20, 2023, regulating the protection of persons who report regulatory and anti-corruption violations, we inform you that, in accordance with the essential principles of this channel, all information received will be analyzed independently and confidentially. In all cases, maximum confidentiality and, where appropriate, anonymity will be guaranteed in the investigation processes of the information received, in order to protect the identity of the informant and the persons affected and their reputation. Only those people who are strictly necessary in the process will be informed. Where appropriate, the competent authority shall be notified of any facts that may constitute a criminal, administrative or labour offence.

The absence of reprisals of any kind against the informant is also guaranteed. If it is confirmed that he has suffered them, the perpetrators of them will be subject to investigation and, where appropriate, sanctioned.

Any information that is intentionally false, malicious or abusive may give rise to proportionate actions against the whistleblower.

We also inform you that, for the management of the internal information system (ethics or whistleblowing channel) of **SOS YACHTING OF SPAIN S.L.**, the HORA X3 **solution is used**, which complies with the privacy and data protection requirements set out in the aforementioned standard. This management tool also complies with the legal requirements of acknowledgment of receipt of the communication to the informant, within the deadlines established according to the type of complaint, in order to respond to the investigation actions, except in cases of particular complexity that require an extension of the period, in which case, it may be extended up to a maximum of another three additional months. except in cases of sexual or gender-based harassment.

Entry into force of the Code of Conduct, Interpretation and Monitoring

The Code of Ethical Conduct entered into force after its approval on 08/03/2024. The present Code of Ethics has been implemented and approved, which has been ratified and approved by the management of **SOS YACHTING OF SPAIN S.L.**tags.

The Code shall be communicated to all members of the Company. It will be in force until its modification or cancellation is approved, which will be duly communicated.

We each undertake the task of reviewing and following this Code, and we comply with all applicable laws, policies, and guidelines. This Code attempts to address many of the situations we face on a day-to-day basis, but it cannot take into account all circumstances.

Seek help from:

- Your direct boss.
- Your HR manager HH.
- Your service coordinator if you are an external collaborator.

All professionals must inform their supervisor about any conduct that we believe, in good faith, is a violation of the Code of Ethical Conduct.

If any of the above three are involved in the situation we wish to report or are unable or have not adequately resolved our concerns, we will report them to a more senior manager or HR manager. We are informed that all personnel have at their disposal an Ethics Channel through which it is possible to report, in a completely confidential manner, behaviors or facts contrary to ethics, current legislation, this Code of Ethical Conduct or the good corporate governance practices that govern our Company. with special emphasis on those that could have criminal significance.

We do not discriminate or retaliate against employees for reporting, in good faith, actual and proven violations. The Appointments and Remuneration Committee shall ensure compliance

with this Code, resolve incidents or doubts regarding its interpretation and adopt the appropriate measures to ensure better compliance.

Failure to comply with this code may result in disciplinary action, including the possibility of dismissal and, where appropriate, the exercise of appropriate legal action.