

**UNIÓ EUROPEA DE CUIDADORS D’AQUARIS**

**COMPLIANCE POLICY**

**DOCUMENT MANAGEMENT SHEET**

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| **TITLE** | COMPLIANCE POLICY |
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| **Version** | 1.0 | **Date** | 11/09/2025 |
| **Reviewed by** |  | **Date** |  |
| **Approved by** |  | **Date** |  |

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**INTERNAL CONTEXT INFORMATIONUNIÓ EUROPEA DE CUIDADORS D’AQUARIS**

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# PURPOSE

This document, defined as the Compliance Policy of the Criminal Risk Prevention Model (hereinafter, “MODEL”) of UNIÓ EUROPEA DE CUIDADORS D'AQUARIS (hereinafter, “UECA”) has the following objectives:

On the one hand, to publicly express the willingness of the Board of Directors, in its capacity as the governing body of UECA, to maintain respectful conduct in accordance with the highest standards, values, and ethical principles that should guide the behavior of all UECA personnel in the performance of their professional activities, reflecting UECA's position of *zero tolerance* for any conduct that is irregular, ethically reprehensible, or constitutes a crime.

On the other hand, to disseminate this to all people obliged to comply with it for their proper understanding and acceptance. All this with the aim of consolidating a culture of compliance and ethics, without exception.

# SCOPE

This policy is a corporate policy of UECA and forms part of its Model.

All UECA members are required to comply with this policy, i.e., both individuals who represent the organization and those who, acting individually or as members of any UECA body or department, are authorized to make decisions on behalf of UECA (i.e., individuals with organizational and control powers as managers and middle managers) and finally, personnel who provide services to UECA under the authority of the individuals mentioned above, regardless of their hierarchical level and geographical or functional location. All of them are referred to as “obligated persons.”

Likewise, UECA suppliers are also within the scope of compliance with this policy.

This policy affects the UECA Model, and all organizational and management procedures defined at UECA, which constitute and form monitoring and control measures to prevent and avoid any ethically reprehensible and, where applicable, criminal conduct.

# OBJECTIVES OF THE MODEL FOR THE PREVENTION OF CRIMES

The fundamental objectives of the UECA Model are as follows:

* To expressly and publicly state UECA's zero tolerance for any type of illegal or ethically reprehensible behavior.
* Establish a system for the prevention and control of criminal risks aimed at minimizing the risk of crime.
* Make it clear that UECA's objectives can only be achieved by complying with the provisions of the legal system and the Code of Conduct in force, which sets out and brings together the ethical values and principles to be followed.
* Avoid criminal penalties for non-compliance with the rules governing the exercise of UECA's activities.
* Inform and raise awareness among all people bound by the Model of the importance and scope of compliance with the Model, as well as the ethical principles contained in the UECA Code of Conduct.
* Raise awareness and train Obligated Persons on criminal risks and reprehensible ethical conduct, adapting the content to the target audience through the most efficient channels for this purpose.
* Inform all Obligated Persons that violations of the provisions contained in the Code of Conduct and in UECA's internal regulations will result in the adoption of measures and, where appropriate, the imposition of disciplinary sanctions.
* Adapt existing control measures to UECA's processes to prevent the commission of these crimes.
* Periodically review the effectiveness of the controls implemented to minimize the risk of crimes being committed.
* Supervise and maintain the proper functioning of the Model implemented, adapting it to changes in the UECA's organization and to modifications in current legislation.
* Periodically report to the administrative body on the fulfillment of objectives, incidents, proposals for improvements, and the evolution of the UECA Model.

# MODEL STRUCTURE

The UECA Model consists of a set of procedures and controls that mitigate, prevent, and seek to avoid the commission of crimes and reprehensible conduct or conduct contrary to the legal system. To this end, it essentially comprises the following elements:

1. **Code of Conduct**: a mandatory document that aims to serve as a model for the organization and management of UECA and establishes the ethical and compliance standards that UECA requires of the people in its organization. It also incorporates both the appropriate monitoring and control measures to prevent reprehensible conduct and conduct constituting crimes (or to significantly reduce the risk of such conduct occurring) and a disciplinary and sanctioning system that adequately punishes non-compliance with the measures and controls.
2. **Ethics Channel**: the established means for receiving communications regarding breaches or illegal activities committed within the organization. This channel allows for written, verbal, or even face-to-face communications and is operational 24 hours a day, 365 days a year.
3. **Compliance Body**: a body with autonomous powers of initiative and control which, among other functions, is responsible for supervising the operation and observance of the UECA Model. It is the body responsible for controlling and monitoring the correct functioning of the controls implemented in the organization.

In addition, it shares all its members with the collegiate body responsible for the internal information system and is therefore also the body responsible for managing the Ethics Channel.

1. **Criminal risk prevention program**: document establishing the system for organizing, managing, and controlling criminal risks in relation to the criminal liability regime for legal persons set out in Article 31 bis of the Spanish Criminal Code.
2. **Risk matrix or criminal risk map**: Document that will identify the activities in which reprehensible conduct or criminal acts that must be prevented may be committed.
3. **Disciplinary regime**: This will adequately sanction non-compliance with the measures established in the Model. It takes into account the collective agreement applicable to UECA, as well as all current labor regulations.

In cases where the non-compliant person does not belong to UECA, the penalty system is based on the termination of commercial relations.

1. **Training plan**: Training is one of the fundamental pillars, as it is an essential element in making all obligated people aware of the Model implemented in the organization. Through training, obligated people are instructed on their role within the Model, as well as the obligations they must assume and the consequences of non-compliance. The training plan will ensure the effectiveness of the Model.

In any case, the UECA will take the appropriate measures to ensure that obligated people are aware of the requirements arising from the implementation of the Model.

1. **Verification**: The Model will be verified periodically and modified, when necessary, in the event of significant breaches, changes in the organization, regulatory changes affecting the activity, or changes in the control structure or in the activity carried out that make such modifications necessary.

# MODIFICATIONS AND INTERPRETATION

This policy will be kept up to date and will be reviewed periodically by the Compliance Body and, on an extraordinary basis, whenever there are significant changes in the general conditions and operation of the UECA, as well as when there are changes in the applicable legislation.

The body responsible for resolving any conflicts that may arise in relation to this document will be the Compliance Body.

# APPROVAL AND ENTRY INTO FORCE

As proof of compliance with all of the above, the Board of Directors of UECA approves this policy, which will enter into force upon its internal and external dissemination.

It will also be published on the UECA corporate website and will form part of the welcome pack given to UECA employees when they join the company.