

ETHICAL CODE



VERSION 2

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INTRODUCCION

At CA SPORTS, achieving our business goals and developing our business in the most efficient and profitable way is undeniably important to us. However, we care just as much, if not more, about how we achieve these goals. On our path to achieving our objectives, we want to rely on sustainability, innovation, ethics, compliance with the law, and social development, among others.

To pave this path, we have drafted and published the present Ethical Code; '*our Ethical Code.*' It encompasses the principles and values that should guide all activities carried out within our organization.

This code cannot exhaustively cover all the behaviors, norms, and procedures we must follow to do things correctly. What it aims to do is establish guiding principles that should direct our behavior and make us recognizable always and under any circumstances; in success, in difficulties, in different markets and legislations, and in an increasingly complex and uncertain world. A guide to help us create, maintain, and strengthen an ethical and corporate culture in which we can feel secure and proud.

FUNDAMENTAL PRINCIPLES

We want our activities to respect the values that define our organization: Ethics, compliance with the law, establishing loyal relationships with partners, suppliers, and customers, etc. These values are key to ensuring our future.

We do not give up on sustainability and social commitment present in all the campaigns and projects we are involved in.

We are aware that the most fragile and precious value we have is trust. To preserve it, whenever we face a decision, it is advisable to ask ourselves some of the following questions:

Is it legal? Does it comply with the expectations of our ethical code? Will we feel comfortable making it public or sharing it with our surroundings?

If any answer is negative, we must be consistent and, in case of any doubt, refrain from acting without having previously consulted and validated it.

SCOPE OF THIS ETHICAL CODE

The guidelines contained in this Ethical Code are mandatory for **all members** of CA SPORTS regardless of their hierarchical position or contractual link.

It affects all activities we carry out anywhere in the world and those that third parties may conduct on our behalf or for our account.

OCCUPATIONAL SAFETY

We are committed to health and safety at work. We guarantee a safe working environment by providing all workers and third parties who occupy our centers or operate under our guidelines with the means, tools, and training to prevent and minimize occupational risks.

We demand compliance with labor legislation on health and safety, commitment to self-protection, observation of obligations in this matter, and - no less important - the reporting of non-compliances that may be observed by any member of the organization or third parties and that endanger the integrity of those who work in our environment.

The following are prohibited:

- (i) The consumption of alcohol, drugs, and narcotics during work hours and in the centers or work environments. This includes the intake of medication - even with a medical prescription - that may impair capabilities at work and without the knowledge of the responsible person.
- (ii) The absence of protective equipment when necessary and in projects where we have responsibilities for the safety of workers and third parties.

It is mandatory:

- (i) To follow training in health and safety when it is required.
- (ii) To report to our superior or through the enabled channel any non-compliance in terms of occupational health and safety that is known.

HUMAN RIGHTS

We are a team made up of people. We all deserve respect, dignity, and recognition. At CA SPORTS, we are aware of the impact that our activities have not only on our group but on the people who receive our services, benefit from them, interact with them, or are simply affected by them. Our projects, sponsorships, and campaigns represent and embrace values that must always be aligned with human rights.

Our commitment includes respecting labor rights, zero tolerance for the use of child labor or the breach of minimum working and development conditions for all those involved in our projects.

We do not tolerate any behavior that infringes on the individual or collective rights of people, ethnic groups, communities, or identifiable groups affected by our activities.

WORK ENVIRONMENT AND HARASSMENT

We respect and enforce respect for diversity, as a competitive advantage and differentiating element that makes us better, more resilient, and enriches us as a group. At CA, being different adds value, as does the equality of everyone in the same environment, with the same opportunities and options to grow and evolve both professionally and personally. We are a very important asset to the organization and must take care of it.

A healthy work environment is one free of harassment or discrimination. We do not tolerate contempt, humiliation, or demeaning treatment among colleagues regardless of their hierarchical levels. Workplace harassment or "*mobbing*" is one of the worst risks for talent retention and well-being, and we will not allow it.

The use of foul language, professional or personal disqualifications in the work environment, or repetitive and persistent behaviors aimed at undermining a member of our group, their isolation, or discreditation are prohibited.

Behaviors of a sexual harassing nature that include insinuations, coercion, aggressive or offensive attitudes with which someone may feel intimidated, uncomfortable, or offended will also not be tolerated.

We also do not tolerate disrespect, inconsideration, or improper treatment coming from our clients, suppliers, or business partners. We will be firm against it.

The aforementioned behaviors will be duly investigated and sanctioned. It is necessary for anyone who witnesses or is aware of the existence of such behaviors to report them through the communication channel enabled for this purpose.

USE OF INFORMATION

The use of confidential information about individuals is inevitable in any organization's environment, and CA is obviously no exception.

Personal data, bank accounts, health, marital status, locations, etc., are information whose use, handling, and preservation must follow certain protocols to prevent their unauthorized dissemination.

It is prohibited to access or take possession of information owned or managed by CA without consented access or authorization. We cannot disclose to third parties or make use of personal data for purposes other than those intended in the course of the activity assigned to us or within our professional attributions.

We maintain confidentiality on data of colleagues, clients, or third parties to which we have access and follow the protocols established within the organization regarding security, access, and communication.

Social Networks are an inexhaustible source of personal information. Although their provision is in principle consented, their dissemination in the work environment is not, in our judgment, conducive to a respectful work climate. It is not allowed to use the means that CA provides to us to disseminate documents related to the privacy of any member of the organization or third party.

We all must know what personal and confidential information exists in our environment and to which these principles and limitations apply. In case of doubt, we should consult the Compliance officer to resolve them or use the communication channel.

TAXATION

As part of legal compliance, the payment of taxes and fiscal transparency is one of the areas where CA SPORTS demonstrates its commitment as a good corporate citizen. We do not evade taxes, do not conduct operations in tax havens to reduce tax payments, and do not carry out strategies that involve hiding data or using illegal shortcuts to fail to meet our tax obligations.

As part of this commitment, all accounting entries, financial statements, and information on economic data or bookkeeping within the CA SPORTS environment will be faithful, truthful, and transparent. It is prohibited to alter or allow the alteration of data or figures that affect the financial status of the organization or the existence of double accountings.

RELATIONS WITH THIRD PARTIES

In the development of our activities, we interact with third parties in all areas and at all levels. How we relate to them greatly determines the success of our projects and the generation of value and trust: the most valuable and intangible asset, yet also the most fragile.

How do we want to relate to them? Without the aim of being exhaustive and with the common denominator of ethics and transparency, this Code outlines the basic guidelines that must be observed with each and every one of them:

- (i) **Sponsoring brands, sports properties, and athletes:** They are the beginning, the reason, and the end of our business. Their satisfaction, loyalty, and appreciation are the foundation and commitment of all our efforts. Our relationship with them will always be based on respect, professionalism, honesty, transparency, and the truthfulness of the information we provide about services, products, and benefits. Partial, biased, or incomplete information is the prelude to a scam and the worst guarantee for establishing lasting relationships. With our clients, we will act with total transparency and honesty, maintaining a principle of active listening to their needs that help us improve and be agile and proactive.
- (ii) **Suppliers:** They are essential to guarantee the production chain and the provision of our services on time and in form. We value their presence, promote their stability in our environment, and treat them with respect, equal opportunities, and fair treatment in selection criteria and commercial relationships. In return, we

demand alignment with our principles and values and will not tolerate the presence of corruption in this area or decisions tainted by conflicts of interest.

(iii) **Partners:** On countless occasions, we find ourselves accompanied by business partners with whom we share projects. We will be fellow travelers of those who share our values and our way of doing things.

(iv) **Competitors:** Our relationship with competitors will always be governed by respect and compliance with legality. CA SPORTS does not fix prices nor engage in market sharing or anticompetitive and fraudulent practices. We operate with transparency, legality, and free and fair competition.

ORGANIZATION'S ASSETS

CA SPORTS provides all of us with the tools and means necessary to correctly carry out our activities. Both - tools and means - are assets of the organization. What assets are we talking about?

Vehicles, tools, materials, supplies, intellectual property, computer systems, software, hardware, facilities... even the corporate brand.

Confidential information about projects, ideas, and opportunities are assets of the organization. We all have an obligation to use them responsibly. We must preserve them, take care of them, maintain them, and prevent their theft, misappropriation, or misuse.

In relation to the assets of CA SPORTS, it is advisable to pay special attention to:

(i) **Internal fraud:** This involves the misuse of assets for personal benefit or the benefit of third parties. Also, their theft, unauthorized transfer, resale... this is a clear detriment to the assets of the organization and to all of us. Do not commit any of these actions with the organization's assets and do not fail to report any use or disposition of assets contrary to this Code.

(ii) **Corporate information and its disclosure:** In our market, innovation, ideas, strategies, and communication are a very valuable and highly competitive asset. A project, a campaign, an idea... are a trade secret or, if you prefer, confidential company information. Preserve it. It's important. It is prohibited to disclose corporate information that is not public and without the consent of the organization. Do not do it and do not allow it.

(iii) **Preservation of CA SPORTS' tangible and intangible assets:** In addition to trust, one of the most significant assets is our reputation. Social networks, the media, or disclosure forums echo any negative assessment that may affect the reputation of an organization. Before issuing judgments about our work, carefully assess the reputational risk and refrain from doing so if it affects it. In case of doubt, seek advice.

COMPETITION

In a free, regulated, and competitive market, it can be very tempting to fix prices, divide the market, or reach agreements that ensure business quotas at the expense of harming our customers. We will never participate in or favor these practices.

It is prohibited to reach pacts or agreements with other companies and organizations to regulate, modify, or set market prices for the services and products we offer. We will never abuse our position, weight, or relevance in the sector to exclude other competitors from it or limit their number. We will always stand out for the quality and excellence of our services, and our success and growth will be based on the application of all the principles contained in this Code.

The confidential information of our organization is very valuable. As we have warned in previous sections of this Code, so is that of our competitors. It is prohibited to obtain confidential information from other companies illicitly and without consent, as well as its subsequent use or incorporation into our production chain. We must always refrain from using sensitive information that is not public and whose origin and method of acquisition we do not know. Always consider—in case of doubt—if the nature of the information you handle were owned by CA SPORTS and how you would react to its use by third parties...

RELATIONS WITH THE ADMINISTRATION

It is necessary, and therefore inevitable, to interact with the Administration. From managing a grant, obtaining a license, or simply managing the payment of our taxes, at some point, we will have the Public Administration as an interlocutor, whether local, regional, state, or with public officials and institutions at an international level. Due to the nature of our business, they will even sometimes be potential customers.

CA SPORTS will maintain a relationship of collaboration, compliance, transparency, and legality in any relationship maintained with public bodies at any level and instance.

It is prohibited to give, promise, or accede to any request that places us in the delicate situation of participating in acts of corruption and buying favors with the Public Administration. We will be kind but firm against these practices. There will be no preferential treatment when it comes to the Administration.

CORRUPTION AND BRIBERY

The purchasing of wills as an option to obtain or retain a business operation is not a valid option at CA SPORTS. We have zero tolerance for corrupt practices or the payment and receipt of bribes. It is undoubtedly one of the most clear and insurmountable red lines.

The prohibition of bribery and its prevention applies to all of us and against all third parties with whom we interact. If you have any doubts regarding the intention of a gift or the nature of a suspicious operation, seek information beforehand through our communication channel or with your Superior.

If you see something related to corruption and bribery... say it.

MONEY LAUNDERING

Companies and organizations are often used as vehicles to introduce into the legal market money or goods whose origin is criminal activity.

CA SPORTS is not a subject obligated by the Law for the Prevention of Money Laundering and Financing of Terrorism, but we are aware of the possibility of being used to launder money or assets of criminal origin. We will not allow it. We will verify to the extent of our means, the origin of payments and transactions and apply the principle of *Knowing Your Customer* to establish basic controls on collections and payments in order to detect suspicious money laundering operations.

COMMUNICATION CHANNEL

Knowing the guiding principles and values of our activity is important. So is reinforcing them by asking, contrasting, and questioning; only in this way will we ensure that we have understood well what is expected of us and what we should, in turn, expect from the organization.

It is also important to communicate any breaches of this Code of which we are witnesses, victims, or of which we may have full knowledge or well-founded suspicions.

From good faith and with the aim of resolving doubts and strengthening our compliance culture, we have made available to everyone a communication channel that is easy, intuitive, confidential, and direct. It serves two important purposes:

- (i) Communicate breaches of legality or the principles of this code.
- (ii) Resolve doubts related to the values and precepts contained in the CA SPORTS Ethical Code or its interpretation and practical application.

All questions will be attended to and resolved, and all communications about non-compliance or irregularities will be treated, investigated, and resolved. CA Sports guarantees the confidentiality of all data processed through this channel and the absence of retaliation against those who in good faith report irregularities of which they are aware.

TRAINING AND INFORMATION

The Compliance Body of CA SPORTS will develop appropriate activities for the dissemination, training, and awareness of the entire collective affected by this Ethical Code.

APPROVAL AND VALIDITY OF THIS ETHICAL CODE

This Code has been approved by the Administration Body of CA SPORTS and came into effect on January 8, 2024.