



CODE OF ETHICS

WORLD LEADERSHIP ALLIANCE CLUB DE MADRID

INTRODUCTION

World Leadership Alliance Club de Madrid (hereinafter Club de Madrid) is committed to generating, disseminating, upholding and keeping up to date an ethical culture that has a positive impact on the organisation's staff and, therefore, on our day-to-day activities.

Club de Madrid puts forward a series of principles in this Code of Ethics to govern the actions of all of the organisation's staff, who shall participate in a continuous training and learning process about the legal requirements that must be complied with and the ethical principles that must be abided by.

The organisation has taken into account two key factors in drawing up its Code of Ethics.

First, the provisions of the current regulations governing the Club de Madrid's activities, which set boundaries that the organisation and its staff may not go beyond under any circumstances, thus defining the framework within which the organisation's activities must be conducted.

Second, the socially accepted customs and practices which enable Club de Madrid to reach the highest quality standards through its dedicated commitment to society.

However, this Code of Ethics must be accepted by the organisation's staff if it is to attain these objectives. Accordingly, all staff must be informed of the existence of the Code of Ethics. In addition, training courses must be given for everyone to understand the principles that have been established and what their aim is.

This will enable the detection and subsequent elimination of practices that negatively affect compliance with regulations or contravene the ethical principles advocated by Club de Madrid.

The ethical awareness that must be assimilated is applicable to all staff, regardless of the position they hold or the specific tasks they perform. This can be corroborated by analysing the topics covered in this Code of Ethics.

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Should any of the staff explicitly breach the provisions of this Code of Ethics, the relevant employment legislation shall prevail in the application of disciplinary measures, which shall be proportionate to the infringement.

The application of disciplinary measures is not intended to be coercive, but instead seeks to ingrain the Code of Ethics in the organisation, equating its content with any other employment obligation which staff must comply with in the workplace.

The Code of Ethics must become the cornerstone that guides the organisation's management and the behaviour of Club de Madrid staff in all areas. This objective can only be attained by the broadest possible dissemination of this Code.

Accordingly, Club de Madrid shall endeavour to disseminate the contents of its Code of Ethics among the organisation's stakeholders and shall recommend that the companies and professionals with which it has a business relationship adhere to it and abide by its principles.

CHAPTER 1. GENERAL PROVISIONS

Article 1. Purpose

The present Code of Ethics establishes the principles and criteria which shall govern the behaviour of Club de Madrid staff in the day-to-day performance of their tasks and duties.

Article 2. Material scope of application

The present Code of Ethics is applicable to all Club de Madrid staff. They shall be bound to comply with and apply it in their day-to-day tasks.

Article 3. Territorial scope of application

1. The present Code of Ethics applies to all branches that Club de Madrid may set up, regardless of the country in which they are located.
2. Should Club de Madrid set up operations in a country whose socially accepted customs and practices are radically different from those laid down in this Code of Ethics, an ad hoc committee shall be appointed to analyse its specific circumstances.

CHAPTER 2. PRINCIPLES

Article 4. Legal principles

All Club de Madrid staff shall comply with the law, understood as the sum of legal, regulatory and other provisions applicable to the organisation's activities.

Likewise, they shall comply with the interpretations of the different supervisory authorities responsible for regulating areas that directly affect Club de Madrid's activities.

Article 5. Ethical principles

All Club de Madrid staff shall follow socially accepted customs and practices in their day-to-day tasks, in keeping with the community in which it operates.

Article 6. Corporate procedures

All Club de Madrid staff shall comply with the guidelines, instructions, requirements and procedures established by the organisation.

Article 7. Duty of disclosure

1. Club de Madrid shall provide its staff with legal information that must be taken into account in the performance of their duties.
2. Club de Madrid shall publish information in this Code and in other internal policy documents about the ethical principles that must govern the behaviour of its staff.
3. Club de Madrid shall inform its staff about the established guidelines, instructions, requirements and procedures, so that everyone is aware of their role and responsibilities.

Article 8. Compliance

Should the information provided, or the instructions given by Club de Madrid be manifestly unlawful, its staff may and must refuse to comply with them.

Should there be any reasonable doubt over the legality of the information provided or the instructions given by Club de Madrid, its staff must report these facts and circumstances to their superiors.

CHAPTER 3. STAFF

Article 9. Non-discrimination

1. Club de Madrid prohibits any type of discrimination on the grounds of nationality, race, religion, political opinion, gender, sexual orientation, illness, physical disability, age, etc. It is committed to drawing up policies and procedures which contribute to the creation of a healthy working environment.
2. Staff are prohibited from engaging in any type of conduct which constitutes, promotes or facilitates discrimination based on nationality, race, religion, political opinion, gender, sexual orientation, illness, physical disability, age, etc.

Article 10. Harassment

1. Club de Madrid prohibits moral harassment, sexual harassment, gender-based harassment and any other conduct which could create an intimidating, offensive or hostile working environment. It is committed to drawing up policies and procedures which contribute to the creation of a healthy working environment.
2. Staff are prohibited from engaging in any type of conduct which constitutes, promotes or facilitates moral harassment, sexual harassment, gender-based harassment or any type of harassment that creates an intimidating, offensive or hostile working environment.

Article 11. Working hours

1. Club de Madrid shall implement the appropriate measures to ensure that working hours do not exceed the limits stipulated in the labour and employment regulations, and the applicable collective bargaining agreement.

2. Club de Madrid shall not impose mandatory overtime, which it undertakes to pay in accordance with employment regulations and the applicable collective bargaining agreement.
3. Club de Madrid shall comply with break times during the working day, rest periods between different working days, and the holiday periods established in the employment regulations and in the applicable collective bargaining agreement.
4. Club de Madrid shall implement a system to record the number of hours worked per day which is in keeping with workers' fundamental rights and freedoms.
5. Club de Madrid staff pledge to truthfully record the number of hours worked per day in the system.

Article 12. Freedom of association

1. Club de Madrid shall guarantee staff rights to join a trade union, freedom of association and collective bargaining.
2. Club de Madrid places itself at the disposal of its staff and undertakes to provide all necessary assistance to ensure that the aforementioned rights are exercised freely and effectively.
3. Club de Madrid staff shall be able to exercise their rights to join a trade union, freedom of association and negotiation pursuant to what is stipulated in the employment legislation and the applicable collective bargaining agreement, ensuring the utmost respect for the organisation and its business activities.

Article 13. Occupational health and safety

Club de Madrid shall ensure that its workplaces have excellent health and safety conditions which enable its staff to properly carry out their duties in occupational health and safety terms.

Staff shall contribute to the proper upkeep of health and safety conditions in the workplace and shall comply with safety guidelines.

Article 14. Right to disconnect

Club de Madrid shall ensure that no professional communications or calls are sent or made to staff outside their working hours or during their rest periods, leave or holidays, with the exceptions and on the terms set out in the right to disconnection policy agreed with staff.

CHAPTER 4. DONORS AND OTHER PARTNERS

Article 15. Quality

Club de Madrid undertakes to conduct its operations with the highest quality standards so as to fulfil its commitments with its donors and other partners.

The organisation's staff understand the quality standards expected by Club de Madrid's donors and other partners, in order to guarantee the excellent performance of the activities.

Article 16. Safety and security

Club de Madrid undertakes to safeguard its activities, in terms of preparing and carrying them out.

Staff understand the high degree of safety and security expected by Club de Madrid's donors and other partners, in order to guarantee the reliable performance of the activities.

Article 17. Transparency

Club de Madrid undertakes to conduct its activities responsibly and transparently, enabling current and potential donors and other partners to engage with the organisation without hidden agendas.

Staff understand that their actions must not have a hidden agenda, guaranteeing current and potential donors and other partners complete transparency in their dealings with Club de Madrid.

Article 18. Advertising

Club de Madrid shall create advertising and communication campaigns using accurate information. It shall not publish false, misleading information or misinformation about its activities.

Realistic content shall be used in all media, avoiding the use of stereotypes or content that is far removed from the reality of society.

Article 19. Respect

Club de Madrid staff shall show the utmost respect to the organisation's current and potential donors and other partners, ensuring their conduct does not constitute any type of discrimination based on nationality, race, religion, political opinion, gender, sexual orientation, illness, physical disability, age, etc.

CHAPTER 5. SUPPLIERS

Article 20. Consideration

Club de Madrid staff shall interact with the organisation's suppliers in a respectful, considerate and ethical manner, always within statutory limits.

Article 21. Objectivity

1. Club de Madrid shall select the organisation's suppliers based on objective criteria following completely transparent processes.
2. Club de Madrid staff must be able to demonstrate the financial criteria used to choose the organisation's suppliers. Personal interests and non-corporate interests must not be taken into account.
3. Club de Madrid staff may not accept or offer gifts, favours or rewards, in cash or in kind, of any nature, when this influences the decision-making process relating to their duties.

Article 22. Proprietary information

Club de Madrid shall decide which corporate information staff may use, according to its importance for the organisation's activities.

In this regard, Club de Madrid's staff shall protect sensitive information and shall not disclose it to third parties, regardless of its purpose.

Article 23. Third-party information

Club de Madrid shall not request or accept information about its suppliers to obtain an illicit advantageous situation over them.

The only objective that staff must pursue is building stable business relationships with suppliers.

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CHAPTER 6. CONFIDENTIALITY

Article 24. Duty of confidentiality

1. All Club de Madrid staff shall be bound by the duty of confidentiality that prevents them from using corporate information for purposes other than the performance of the organisation's activities.
2. The duty of confidentiality extends to all types of information that Club de Madrid requires to perform its activities.
3. The duty of confidentiality shall last indefinitely, which is why it shall be upheld even after the staff's relationship with Club de Madrid has finished.

Article 25. Data protection

Club de Madrid shall implement the necessary technical and organisational security measures to safeguard the protection of information regarding any natural person who has dealings with the organisation.

Once staff have been made aware of their obligations in terms of personal data protection, they shall act diligently and safeguard personal information to which they have access, using it only for the specific, explicit and legitimate purposes for which it has been collected.

Article 26. Privacy protection

Club de Madrid staff shall ensure the utmost respect for the personal and family privacy of all natural persons who have dealings with the organisation.

Therefore, Club de Madrid staff are advised to focus on resolving specific issues from a purely professional point of view, refraining from entering into personal relationships of trust that may lead to information leaks concerning the private life of that person.

CHAPTER 7. INTELLECTUAL AND INDUSTRIAL PROPERTY

Article 27. Intellectual property

Club de Madrid shall ensure the highest protection and consideration for original literary, artistic and scientific works published by third parties in any media.

Accordingly, Club de Madrid staff must check that the original third party works they intend to use are not protected by copyright and can therefore be used legally without the need to obtain any rights or permission.

Should rights or permission need to be obtained, Club de Madrid staff must verify that the organisation has obtained them to lawfully use these original third-party works.

Article 28. Industrial property

Club de Madrid shall guarantee maximum compliance with current industrial property legislation with regard to patents, trademarks, domain names, reproduction rights, design rights, database retrieval rights, own and third-party distinctive signs and rights over specialised technical knowledge, among others.

Club de Madrid staff shall endeavour to develop new products and/or services that are sufficiently original, avoiding any reliance on goods protected by industrial property.

Article 29. Advertising

Club de Madrid staff shall only use the brands, images, texts and, in general, any distinctive signs that have been duly authorised by the organisation for advertising purposes.

Article 30. Staff creations

1. Original works created by Club de Madrid staff shall belong to the organisation, without prejudice to the moral rights of the author.
2. Industrial property innovations (patents, trademarks, domain names, reproduction rights, design rights, database retrieval rights, own and third-party distinctive signs and rights over specialised technical knowledge, among others) created by Club de Madrid staff shall belong to the organisation, which must register them appropriately.

Article 31. Distinctive signs

Club de Madrid shall use original distinctive signs that may not be used for purposes other than those for which they were created.

If any distinctive sign is used by a specific group to defend purposes other than those for which it was created, appropriate action will be taken to protect the ownership of the sign and prevent its use by third parties.

CHAPTER 8. CORPORATE SOCIAL RESPONSIBILITY

Article 32. Commitment to society

Club de Madrid shall voluntarily undertake the necessary initiatives required to actively contribute to social, economic and environmental progress. This will enable the organisation to sustainably conduct its own activities. This principle is constantly conveyed to its staff.

Article 33. Use of resources

Club de Madrid undertakes to use the minimum resources required for it to conduct its day-to-day activities, whilst always ensuring the highest standards of quality of the products and/or services it provides.

Staff shall refrain from misusing resources and shall ensure they use the minimum resources and goods necessary to perform their duties.

Article 34. Consumption

1. Club de Madrid shall prioritise products that have the lowest possible impact on the environment and are based on the minimum use of resources.
2. Club de Madrid shall prioritise services that have the lowest possible impact on the environment and are based on the minimum use of resources.
3. Club de Madrid shall prioritise suppliers whose operations generate the lowest possible impact on the environment and are based on the minimum use of resources.

Article 35. Waste

1. Club de Madrid shall take all appropriate measures to prevent waste generation during its day-to-day activities.
2. Club de Madrid shall appropriately manage the waste generated during its activities, minimising risks to health and the environment.
3. Club de Madrid staff shall endeavour to generate the minimum possible waste. Any waste generated shall be diligently managed so as to minimise risks to health and the environment.

Article 36. Operations

Club de Madrid shall record all the financial operations the organisation engages in.

Club de Madrid staff shall clearly and accurately record all the organisation's business activities in the statutory accounting records.

Article 37. Government

Club de Madrid staff shall cooperate with government authorities respectfully and transparently, ensuring that all actions taken comply with current legislation.

CHAPTER 9. WHISTLEBLOWING

Article 38. Duty to report

Club de Madrid staff have the duty to report any breach of this Code of Ethics of which they may become aware and which could have a negative impact on the organisation's Corporate Social Responsibility or entail legal consequences of any kind. They shall report said breach to their superiors through the channels provided for this purpose.

Article 39. Retaliation

No disciplinary measures or retaliation shall be taken against Club de Madrid staff who report any facts or events that could breach the provisions of this Code of Ethics.

Article 40. Queries

Any member of the Club de Madrid team who has queries or concerns regarding facts that could breach this Code of Ethics can contact the staff in charge of the organisation's Corporate Social Responsibility, requesting a response.

CHAPTER 10. DISSEMINATION AND COMPLIANCE

Article 41. Dissemination

Club de Madrid shall disseminate the content of this Code of Ethics among the organisation's staff via a method that proves the information has been sent and has been subsequently received and understood by the recipients.

It shall be disseminated using the organisation's own channels. The staff's personal information shall not be used and their right to disconnect shall be safeguarded.

Article 42. Acceptance and adherence

Club de Madrid shall endeavour to ensure that any third party with whom it has a business relationship accepts this Code of Ethics and adheres to it.

Should any third party have its own Code of Ethics, Club de Madrid shall verify that the principles on which it is based are in line with this Code of Ethics.

Article 43. Penalties

Failure to comply with the provisions of this Code of Ethics shall carry the labour penalties set out in Spanish Royal Legislative Decree 2/2015, of 23 October, which approves the recast text of the Workers' Statute Law and the applicable collective bargaining agreement, without prejudice to any actions that may lead to criminal penalties being imposed by the Courts and Tribunals in accordance with the provisions of the Spanish Criminal Code (Organic Law 10/1995, of 23 November).

Article 44. Ethics Committee

An Ethics Committee has been appointed to ensure compliance with the provisions of this Code of Ethics. It shall be responsible for dealing with any reports of non-compliance or queries regarding the interpretation of the Code's contents.

The contact details of the Ethics Committee are: rhidalgo@clubmadrid.org.

The Ethics Committee shall normally act upon the request of a party, although it may act ex officio if it considers that certain facts and circumstances of which it becomes aware require in-depth analysis.

CHAPTER 11. REVIEW AND VALIDITY

Article 45. Review

This Code of Ethics shall be revised when substantial regulatory changes, social changes or changes in the structure of the organisation occur, thus ensuring that it does not become obsolete.

The present Code of Ethics shall be revised and updated, as appropriate, every two years.

Article 46. Validity

This Code of Ethics has been approved by the Management of Club de Madrid and shall be effective from the day after it has been signed.

SIGNED IN MADRID ON APRIL 4, 2024



WORLD LEADERSHIP ALLIANCE
CLUB DE MADRID

RICARDO HIDALGO GARCÍA

CHIEF FINANCIAL OFFICER / HEAD OF THE INTERNAL INFORMATION SYSTEM