

CORPORATE SOCIAL RESPONSIBILITY

ANTI-BRIBERY POLICY OF EDUCTRADE

Eductrade follows a policy of total and absolute rejection (zero tolerance) of any form of corruption, whether in the public or private sector. For this purpose, some rules of procedure and conduct (Code of Conduct) have been established to be followed by all employees, members of the Governing Body, Senior Management, suppliers and contractors, regardless of the position or the function that they perform. Eductrade ensures the compliance of the applicable Anti-Bribery legislation in force, described in the context of its Bribery Risk Management System.

Likewise, there are specific conduct guidelines to be observed by agents, intermediaries, advisors, partners and suppliers who work with Eductrade. The purchasing and selling procedures will be carried out properly and transparently, ensuring the appropriate choice of the suppliers and the corresponding management and contracts.

For proper communication of these corporate principles and standards, training and awareness guidelines on corruption prevention have been established which must be adopted, on a mandatory basis, by all employees.

As part of this corruption prevention policy, regulations and controls regarding the reception and acceptance of gifts and invitations have been implemented and are available to all employees.

Likewise, and in accordance with the internal regulations of Eductrade, so-called facilitation payments are also rejected, since they may be considered, in certain cases, as acts of corruption.

Communication channels are made available to Eductrade's employees (<https://app.laworatory.com/ethical-channel/eductrade>) through which they may communicate confidentially to the Compliance Body the perpetration of possible acts of corruption of which they have knowledge according to their professional activity. Through these channels, both the prohibition of retaliation against employees who have reported a possible act of corruption in good faith, as well as the right of the person accused to defend him/herself, are thereby ensured.

It is the responsibility of the Internal Compliance and Anti-Bribery Control and Supervision Body to carry out the supervision and monitoring of the effective implementation and execution of the controls on corruption prevention. This body has full authority, independence and autonomy to develop its functions.

In case of non-compliance with this Anti-Bribery policy, Eductrade has a disciplinary system which aims to prevent illicit conduct that deviates from the provisions of the Law and / or breaks the internal rules or procedures established by the company, acting as a mechanism for exemplarity, correction and resolution.

Eductrade is committed to the continuous improvement of its Bribery Risk Management System.

Francisco J. Mozos
Chief Executive Officer

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