

**SPONSORSHIP, PATRONAGE
AND COLLABORATION POLICY**

sando

SPONSORSHIP, PATRONAGE AND COLLABORATION POLICY

GENERAL PRINCIPLES OF ACTION

Sponsorship, patronage and collaboration in activities of social and cultural interest are communication techniques accepted and promoted in the SANDO GROUP, as they are linked to or close to its field of activity.

In this context, the aim is to convey to the companies that are part of the Group the ethical values and corporate responsibility that govern the actions of the Companies, publicising the company and its commitment to sustainable development and the local communities where we are located, both from a social perspective and from an environmental perspective.

KEY POINTS TO KEEP IN MIND

The purpose of this policy is to specify the general principles of action of SANDO for the actions of patronage, sponsorship and academic collaboration in the social and cultural field.

Projects and actions that enhance the value of the company's activity, facilities, and professionals should be encouraged to raise awareness of the company and promote its values and commitment to sustainable and social development. In any case, priority should be given to projects that link the company with the local community.

Projects must show priority, respect for sustainable and social development, the desire to take territorial roots, the commitment to corporate responsibility, and the affirmation of ethics and integrity.

For this policy, the following definitions shall apply:

- **sponsorship** is material support, usually financial, provided to an organisation or entity to obtain a direct benefit from the presence of SANDO's corporate image (publicity, notoriety, etc.); the sponsorship may be of a social or commercial nature.
- **patronage** is material support (financial, human or technical) provided without direct compensation by the beneficiary to work, person or entity for the exercise of activities of a general interest,

usually of a cultural, social, scientific or humanitarian nature, to enhance the value of SANDO in the medium and long term;

- **academic collaboration**, the agreement and funding of a chair or research project with educational and research institutions in the humanities and social sciences field.

This policy applies to all professionals who are part of the company at all levels (directors, managers and employees are considered such) (the "Professionals").

Failure to comply with the provisions of this policy or any of the criteria for action contained therein will lead to disciplinary sanctions that, where appropriate, may lead to the termination of the employment or commercial relationship that the offender maintains with SANDO.

A Communication Channel has been made available to all the Company's Professionals (via email **codigodeconducta@sando.com**) to address and resolve any questions, doubts or uncertainties regarding the application of this policy in each specific case.

ACTION CRITERIA

The following criteria for action in patronage, sponsorship and academic collaboration respond to the ethical principles and corporate and social responsibility governing SANDO's activity development.

First. Sponsorship and patronage actions must be consistent with SANDO's activities and be carried out for the benefit of bodies whose purpose, status, reputation and financial situation do not entail subsequent ethical or financial risk for the company.

Second. Commercial sponsorship actions must be consistent with SANDO's areas of action and values. Priority will be given to actions that strengthen the Group's position in the following areas: construction, sustainable development, business excellence, innovation, cooperation and alliances, talent, environment and social involvement.

Third. Social sponsorship or patronage actions will preferably be carried out within four lines: education, awareness, integration, and, in particular, actions linked to community development, such as promoting healthy habits, cultural participation, and socio-economic development.

Room. Any sponsorship or patronage in favour of persons, entities or organisations that carry out or promote activities contrary to the laws, fundamental rights and constitutional principles, and, in any case, contrary to the values and ethical principles of SANDO, is prohibited. Under no circumstances may the contribution made by the company be made to promise, offer or secure competitive advantages for SANDO.

Likewise, structural sponsorship through participation in the share capital of beneficiary entities or organisations is prohibited.

Fifth. Sponsorship or patronage actions that include polluting operations are excluded.

Sixth. Academic collaborations with universities and schools must be consistent with the ethical principles that govern the company's activity. Preference will be given to partnerships with universities and chairs closely related to the business line of the companies belonging to the Group. These collaborations should strengthen knowledge and feed the debate on strategic issues for the Group.

Seventh. Any patronage, sponsorship or academic collaboration action must be formalised in writing between the corresponding company and the beneficiary body through a fixed-term contract or agreement.

In this sense, concerning sponsorship actions, attention will be paid to the value of economic support concerning the importance of the event and the expected benefits (reputation of the event, media coverage, eventual presence of other sponsors, cultural significance, among others). Likewise, the contract or agreement will detail the counterparts for the company (brand visibility, exclusive event for the sponsor, invitations for employees or others, etc.).

The legal department of the SANDO GROUP will negotiate the terms and conditions and draft the corresponding sponsorship, patronage or academic collaboration contract or agreement.

Eighth. Patronage, sponsorship or academic collaboration actions will require the following authorisation and monitoring processes:

- For **actions with an amount of less than €15,000** (excluding taxes), authorisation must be obtained from the General Management of the area, which will be responsible for reporting the action to its corresponding Management Committee and informing the Compliance Body to include the action in the annual report on sponsorships, patronage and collaborations.

- When the amount of the action is **equal to or greater than €15,000** (excluding taxes), **prior authorisation from the Compliance Body is required**. An authorisation request will be made to the *Compliance Body*, detailing the format and interest in the company. The *CB* will review the requests received, along with the legal and finance departments, after which it will deny or authorise the action.
 - Under no circumstances may a contract or agreement exceed 15,000 euros be entered into if the prior written authorisation of the *CB* has not been received.
- When the share amount exceeds **€30,000** (excluding taxes), **prior approval from the Board of Directors is required**. A request will be made to the *OC*, who will review the request with the legal and financial departments and, if the report is favourable, will submit it to the Board of Directors for prior authorisation.

To determine the corresponding authorisation process, if several contracts or agreements are to be signed with the same beneficiary in the same period, as in multi-year contracts, the amount of sponsorship, patronage or collaboration action will be calculated on the total committed by the company.

Ninth. All actions carried out, regardless of their amount, will be included in the Annual Report on Patronage, Sponsorship and Collaboration Actions Carried Out, which the Compliance Body will report annually to the Board of Directors.

REPORTING OF NON-COMPLIANCE

Any SANDO employee who becomes aware of an action that violates this policy or constitutes a breach of any of its rules of conduct must report it to the *Compliance Body* by any of the following means:

- Through the Whistleblowing Channel enabled on the SANDO intranet
- By letter addressed to:

Criminal Enforcement Body

Avenida José Ortega y Gasset, 112 – SANDO Building
29006 - Malaga

All reports of violations of this policy and its rules of conduct will be considered and appropriately investigated.

Such notification will be protected by confidentiality as long as it is given in good faith.

COMMUNICATION OF THIS POLICY

This SPONSORSHIP, PATRONAGE AND COLLABORATION POLICY will be communicated to all administrators, managers and employees of SANDO, as well as periodic actions to raise awareness and remind them of its existence.

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NOTE: This policy is annexed to the Protocol on the Prevention and Detection of Crimes, approved **by the SANDO Board of Directors at its meeting on April 30, 2021.**