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CODE OF ETHICS – CODE OF CONDUCT

Fábrica Nacional de Moneda y Timbre – Real Casa de la Moneda

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1. Changes from previous versions

- Inclusion of the current section
- Modified section 5.3 “Zero tolerance with corruption and bribery practices”
- Modified section 5.4 “Donations, contributions and sponsorships”
- Modified section 5.5 “Protection of human and labour rights”
- Included section 6.5 “Politically exposed persons”
- Modified section 9 “Related documents. Annexes P.G.CL.00003.03 and P.G.CL.00003.04 have been altered”

2. Introduction

This Code of Ethics or Conduct is intended to set out the principles and values that guide the activity carried out by the Fábrica Nacional de Moneda y Timbre - Real Casa de la Moneda (hereinafter “FNMT-RCM”), and should be considered as a guide for its employees, managers and members of the Board of Directors in all their professional relationships.

The Code does not cover all possible situations that may arise, but it does set out the principles that should guide the behaviour of the persons working at the FNMT-RCM at all times.

Throughout its history, the FNMT-RCM has developed a set of values that constitute the frame of reference on which the execution of its products and the provision of services to society are based, these values being the following:

- **Security:** All its activities are based on comprehensive security, security applied to production processes, products, information processing, facilities and people.
- Professionalism: It is a commitment to honest, responsible and efficient performance of duties, focused on achieving excellence.
- **Quality:** The FNMT-RCM is committed to the quality that governs the Entity’s daily activity, understanding and meeting the needs of our product and service recipients and promoting continuous improvement actions.
- **Confidentiality:** All persons within the Entity shall exercise discretion and prudence in the processing of information and in their communications with third parties.
- **Sustainable growth:** Understood as industrial development in a way that is compatible with the environment and environmental policies.

- **Technological advancement:** Aimed at providing the products and services produced by the FNMT-RCM with the highest technological level possible at any given time, in accordance with the available R&D&I budget.
- **Collaboration and commitment to public authorities and bodies:** In order to provide companies and citizens with access to public services related to the Entity's activity in the best possible conditions.

To this end, it is essential that all staff are familiar with this Code of Conduct and that they comply with it and adhere to the principles of the Code in the performance of their duties. This is without prejudice to any other internal rules of a special nature that may be introduced from time to time and, of course, to the legislation in force.

3. Purpose

The purpose of this Code of Conduct is to formalise the principles and values intrinsic to the FNMT-RCM, which must be respected by all employees, managers and governing bodies of the organisation.

Furthermore, this document is intended to serve as a guide in internal and external relations, reinforcing the values that are the hallmarks of the FNMT-RCM.

4. Scope of application

This Code applies to and is binding for the following groups of persons and entities:

Members of the Board of Directors.

All managers and employees of the FNMT-RCM.

Companies and organisations related to the FNMT-RCM through a controlling interest or whose management and/or administration is entrusted to the FNMT-RCM.

Collaborating companies or contractors, intermediaries and agents, who shall share these rules of conduct with their own management staff and employees and, where appropriate, to subcontractors awarded contracts with the FNMT-RCM, all in accordance with the legal instruments regulating the relevant contractual relations.

It is the responsibility of the persons and companies listed above to ensure that this Code is observed and complied with. No breach of the Code will be tolerated or ignored, and no employee who reports suspicious or illegal activities or activities contrary to the Code through the channels provided by the FNMT-RCM may be punished for this reason, in accordance with the Collective Bargaining Agreement

of the FNMT-RCM, labour legislation and all other civil and commercial obligations entered into by the FNMT-RCM staff, management or Board of Directors, without prejudice to any criminal liability that may arise from the commission of offences.

5. Ethical principles and values of the FNMT-RCM

FNMT-RCM's corporate culture is focused on achieving positive results in all areas of the organisation, based on honesty and professionalism at work, compliance with current legislation and corporate responsibility.

This Code of Conduct is based on the following PRINCIPLES and ETHICAL VALUES, which must be complied with in the performance of its duties:

5.1 Equal opportunities and non-discrimination

The FNMT-RCM will select and promote its managers and employees in accordance with the principles of merit and ability and will promote equal treatment between men and women. It will also promote equal opportunities and will not discriminate on grounds of race, gender, marital status, sexual orientation, ideology, religion, nationality, disability or any other personal condition.

5.2 Professional conduct. Quality

Managers and employees of the FNMT-RCM will carry out their activities in accordance with the general principles of integrity, honesty and transparency, acting with dedication and diligence.

They will comply with the established quality standards, pledging to act in accordance with their responsibilities, putting into practice continuous improvement and adaptation to new technologies, as established in the Entity’s

Business Plan, with the aim of achieving maximum satisfaction for the beneficiaries of the activity.

5.3 Zero tolerance for acts of bribery and corruption

The FNMT-RCM is fully committed to complying with the law and the regulations in the sectors in which it operates, and applies a zero tolerance policy to all forms of bribery and corruption.

All FNMT-RCM employees, as well as intermediaries and commercial agents providing services for the Entity shall perform their duties with diligence and professionalism, avoiding any activity or conduct set out in the FNMT-RCM Anti-Corruption Policy, and any other that could constitute acts of bribery and corruption.

In this regard, FNMT-RCM managers and employees shall not promise, offer or give gifts, financial or in-kind remuneration, favours, donations or similar to third parties (including civil servants and staff of public bodies and entities) in exchange for any type of compensation, advantageous treatment or decision contrary to the law, whether made directly or indirectly through related persons (such as intermediaries or commercial agents).

This type of compensation, advantages or gifts shall not be accepted from clients, suppliers, civil servants, institutions or any other person or entity participating in procurement procedures or awarded contracts under procedures or, where appropriate, with whom it carries out operations in which the FNMT-RCM is a supplier/recipient of goods or a provider/recipient of services.

Commercial agents

Sales agents and intermediaries are required to identify themselves as representatives of the FNMT-RCM when dealing with public authorities in the course of their work. The maximum limit on the amount of gifts and hospitality received and granted also applies to agents and intermediaries working on behalf of the FNMT-RCM. If they occur, they are obliged to register them, and to inform the FNMT-RCM.

Gifts and Hospitality

Promotional gifts of an estimated value not exceeding EUR 100.00 or the equivalent amount in the relevant currency may be given or accepted as a courtesy when such gifts are reasonably related to existing business relationships.

Any gift exceeding the value of EUR 100.00 shall be refused and returned. In the event that it is not possible to return the gift, the HR Department will be informed of the receipt of the gift and will keep a record and analyse the value of the gift before deciding what to do with it. In the event that, for reasons of courtesy, it is not possible to return a gift, the HR Department will donate it, hold a draw among all employees, or any other action it deems appropriate in total transparency and respecting the ethical principles and values of the FNMT-RCM.

The FNMT-RCM Anti-Corruption Policy includes further details on the possible acceptance and management of gifts or presents.

Failure to comply with the above guidelines on possible bribery, corruption, facilitation payments, and anti-competitive behaviour, will be considered very serious misconduct in accordance with the Collective Bargaining Agreement in force.

5.4 Donations, contributions and sponsorships

Donations, contributions and sponsorships to political parties or groups, federations, coalitions or groups of voters are prohibited in the Entity, as well as their receipt by the FNMT-RCM from any of these groups.

Furthermore, any donation, contribution or sponsorship to organisations that are related to clients, government bodies or suppliers of the FNMT-RCM is prohibited, unless they have a favourable report from the Government Legal Service.

5.5 Protection of human and labour rights

The FNMT-RCM expresses its commitment to respect the human and labour rights recognised in national and international legislation, in particular the Conventions of the International Labour Organization on forced labour, freedom of association, the right to collective bargaining, the abolition of child labour and the elimination of discrimination in employment.

5.6 Training

The FNMT-RCM will promote the training of its staff, both from a technical and behavioural perspective, fostering a culture of compliance, equal opportunities, appropriate technical training adapted to specific needs through the identification of professional gaps based on a skills matrix for each job, and a skills development plan based on communication and mutual trust between each employee and their immediate supervisor.

FNMT-RCM managers and employees undertake to continually update their technical and management knowledge in order to develop their skills and to comply with the principles and values of the organisation, completing the training activities assigned to them in the training plans provided by the Entity in order to promote their professional development and provide value to the recipients of the products and services.

5.7 Incompatibilities

FNMT-RCM managers and staff are subject to the regime of incompatible activities laid down in Law 53/1984, of 26 December, on incompatible activities corresponding to staff employed in the Public Administration and implementing regulations.

In accordance with Article 19 of Law 53/1984, “collaboration and occasional attendance at congresses, seminars, conferences and courses of a professional nature” is exempt from the incompatibility regime.

5.8 Conflicts of interest

A conflict of interest is any situation in which the interests of persons related to the FNMT-RCM may be directly or indirectly different from or opposed to the interests of the organisation, whether for personal, professional, business or any other reason.

The professional has a personal interest when the matter concerns them or a person related to them. The following are considered to be persons related to the professional:

1. The professional's spouse or domestic partner.

2. Ascendants, descendants up to the fourth degree of consanguinity and siblings of the professional.
3. The spouses of the professional's ascendants, descendants and siblings. For the above purposes, de facto unions and other similar affective relationships are included.

Companies in which the employee or manager, either personally or through an intermediary, is in one of the situations referred to in the first paragraph of Article 42 of the Commercial Code1 are also considered to be related.

Managers and employees of the FNMT-RCM shall not take part in procurement processes for the selection of contractors or the award of contracts for goods or services intended for the Entity, or in processes for the disposal of assets belonging to the Entity or the administration of assets they are responsible for, either directly or through related persons.

By way of example, the following are situations that could give rise to a conflict of interest:

- Entering into a contract on behalf of the FNMT-RCM with a supplier company that is owned or managed by a family member or personal friend.
- Working as a collaborator of a supplier or client of FNMT-RCM.
- Carrying out business as a self-employed person of a similar nature to the work performed at FNMT-RCM.
- Having a personal or financial interest in a business with FNMT-RCM.
- Obtaining a personal advantage or financial gain —outside the normal remuneration— as a result of an agreement reached by a third party with the FNMT-RCM.

Decisions shall always be based on the best interests of the FNMT-RCM so that they are not conditioned by personal relationships or other particular interests of the employee.

The following guiding principles shall be taken into account by the organisation’s professionals in relation to potential conflicts of interest:

1. **Independence:** act at all times with professionalism and loyalty to the FNMT-RCM, regardless of own or third-party interests.

2. **Abstention:** refrain from intervening in or influencing decisions that may affect FNMT-RCM where there is a conflict of interest, from participating in meetings at which such decisions are raised and from accessing confidential information relating to the conflict of interest.
3. **Disclosure:** report any conflicts of interest in which they are involved to their immediate supervisor or the legal representatives available at the FNMT-RCM before carrying out the transaction or concluding the business in question.

Therefore, managers and employees who may be subject to a conflict of interest in the performance of their duties shall refrain from making decisions and, if there is any doubt as to a possible conflict of interest, the person concerned shall disclose it to their immediate supervisor.

1.Situations of control of companies:

a. Holds a majority of the voting rights.

b. Has the power to appoint or dismiss the majority of the members of the governing body.

c. May hold, pursuant to agreements concluded with third parties, a majority of the voting rights.

d. Has appointed with its votes the majority of the members of the governing body in office at the time the consolidated accounts are to be drawn up and during the two immediately preceding financial years.

5.9 Health and safety at work

A fundamental objective of the FNMT-RCM is adequate management of health and safety at work, complying with the prevention legislation applicable to its workplaces and continuous improvement in the control of risks and in the working conditions of its employees.

Similarly, it expresses its total rejection of harassment, whether psychological, sexual or for reasons of gender, and its firm determination and willingness not to tolerate any of the above situations.

Managers and employees shall be aware of, comply with and enforce the rules designed to protect the health and safety of workers and all persons affected by the performance of their activities (customers, suppliers, collaborators,

subcontractors, etc.), ensure that workplaces are kept safe and healthy and eliminate any behaviour that could be considered harassment.

5.10 Confidentiality

Due to the nature of the activity carried out by the FNMT-RCM, information is an important asset of the organisation and should therefore be given special treatment.

“Confidential” information is all information used or generated in the Entity’s activity that is not public knowledge and which relates to products, services, customers, suppliers, personnel, working methods, organisation, business strategies, economic and financial information, etc., in accordance with Procedure “ES.SI.02.00001 Standard for classifying information according to its confidentiality" and subsequent updates.

The handling of confidential information shall be restricted to those persons who need to use it for the performance of their activity within the Entity and it shall not be provided to third parties, except for information or technical specifications that must be provided to suppliers for the procurement of goods and services, who shall be required to observe the same confidentiality obligations.

Confidential information received from outside companies shall also be treated and handled with the same discretion.

In the event of termination of the employment or professional relationship, the obligation to keep information strictly confidential shall remain in force, and said information shall not be used in the interest of another company or entity or disclosed without FNMT-RCM’s express consent.

5.11 Environment

The FNMT-RCM shall conduct its operations in such a way as to avoid or reduce as far as possible any negative impact on the environment, complying with legal requirements and acting promptly to address any anomalies that may cause environmental damage.

The persons concerned, within the scope of their responsibilities, shall be aware of the environmental policy and shall comply with the rules related to good environmental practices, making efficient use of the facilities, work equipment and resources placed at their disposal.

All employees are also expected to report any anomalies that violate or may violate environmental standards they observe to their immediate supervisor, and to promote energy saving.

5.12 Audits and Inspections

All employees shall cooperate fully in internal and external audits, investigations and enquiries to which the organisation may be subject, maintaining a cooperative and transparent attitude during the course of the audits, investigations and inquiries conducted by the reviewing or auditing body.

In addition, in the course of our business, we may be subject to investigations or requests for information by public officials or regulatory bodies. If we become aware of any potential investigation or enquiry, we shall report it immediately to our direct supervisor and the Legal Directorate before taking any action. With regard to audits, investigations and enquiries, we shall NOT:

Destroy, alter or conceal documents in anticipation of, or in response to, a request for them.

Provide incomplete —unless the required information or documentation is wholly unavailable— false or misleading statements to an organisational investigator, external auditor or public official, or attempt to influence others to provide such statements.

Conduct an investigation individually, as the necessary and appropriate resources must be allocated for investigations.

6. Ethical principles related to the business environment

The FNMT-RCM is aware that its business activity impacts the social, environmental and economic spheres, which affects its different stakeholders (public authorities and bodies, companies, individuals, etc.) and the Entity in general.

FNMT-RCM managers and employees shall carry out their activities integrating the concept of sustainability in their actions and daily decision-making, and shall comply with the relevant national and international social, labour and environmental legislation.

6.1 Clients

One of the Entity's most important assets is its "prestige," which is why managers and employees will always adopt a service-oriented approach in their relations with customers, promoting product and service quality and maintaining respectful and honest relations, actively seeking out new business and the continuous improvement of competitiveness, consolidating the FNMT-RCM as a public-interest company.

Information received from customers will be safeguarded in accordance with the provisions of the confidentiality section of this Code of Conduct.

6.2 Suppliers

In accordance with Public Sector Contracts legislation and the Entity' s Procurement Rules and Criteria, supplier procurement procedures shall be governed by the principles of freedom of access to tenders, publication and transparency, non-discrimination and equal treatment of candidates, and shall ensure, in connection with the objective of budgetary stability and expenditure control, an efficient use of funds.

Staff involved in procurement processes shall refrain from disclosing prices and information submitted by suppliers to third parties, except where required by law. Furthermore, they shall behave impartially, always acting in the best interests of the Entity, basing their actions on criteria of quality, profitability and service. There is also a Supplier Code of Conduct that sets out the commitments to be undertaken by suppliers.

6.3 Internal and external communication

The FNMT-RCM shall establish an effective internal line of communication between employees, management and the different departments of the Entity, and provide consistent and truthful information on its policies and actions so as to help reduce uncertainty and avoid the spread of rumours. The aim is to achieve a positive image and an appropriate working environment that enhances the

sense of belonging of the Entity's staff. Transparency between the different groups shall be one of the basic principles governing the internal communication of all FNMT-RCM staff.

The FNMT-RCM name and trademark are some of the most important assets of the Entity; therefore, managers and employees will take the utmost care to preserve its image in any public or media event. All information requested by the media will be forwarded to the Communications Department, which will coordinate and approve any dissemination of information in advance.

6.4 Antitrust

The FNMT-RCM, as a public undertaking and an instrument reporting to the General State Administration, shall apply the principle of free competition in those areas and products where current legislation does not establish otherwise, and implement a Competition Policy.

6.5 Politically Exposed Persons (PEP)

The FNMT-RCM is prohibited from using or employing Politically Exposed Persons (PEPs) for the creation of new business opportunities. Therefore, prior to the provision of the product/service, it will be checked whether the business opportunity is linked to the involvement of Politically Exposed Persons (PEPs). In the event of detecting a coincidence or sufficient evidence of a link with PEPs, the Compliance Committee shall assess whether to reject the business opportunity. The Anti-Corruption Policy provides a detailed definition of Politically Exposed Persons.

7. Ethical principles related to the use of resources

7.1 Equipment and Internet use

The FNMT-RCM shall provide its managers and employees with the resources and equipment needed to perform their work, and the latter shall use these resources responsibly.

The FNMT-RCM is the owner of the property or the rights of use of the computer programmes and systems, equipment, manuals, videos, projects, studies, reports and other works and rights created, developed, perfected or used by its

employees for work purposes or based on the FNMT-RCM's computer facilities and resources, and they shall not use them for private purposes or for any other purpose unrelated to the FNMT-RCM, replicate them, transfer them or use them to obtain a profit.

Managers and employees shall respect the principle of confidentiality with regard to the characteristics of the rights, licences, programmes, systems and technological knowledge, the ownership or rights of use to which correspond to the FNMT-RCM.

The use of the equipment, computer systems and programmes that the FNMT-RCM makes available to managers and employees to perform their work, including the facility to access and operate on the Internet, must comply with security and efficiency criteria, excluding any use, action or computer function contrary to the instructions or interests of the FNMT-RCM, which are reflected in the "FNMT-RCM Integral Security Manual".

Individual passwords to FNMT-RCM computer systems shall be kept strictly confidential. The username and password for operating systems, applications, telephony, email, etc., are personal and non-transferable; they authenticate the user in the system and give them access to their authorised area.

For this reason, except in expressly authorised cases, the sharing of usernames/passwords, electronic signature certificates or any other authentication system with other persons is strictly prohibited.

In the event that a person becomes aware that their password is known to another person, they should change it immediately. In the case of a temporary replacement, the replacement shall receive an individual access authorisation and shall not use the access authorisation of the person being replaced.

Managers and employees shall not install or use on the computer equipment that the FNMT-RCM places at their disposal, programmes or applications whose installation, downloading or use is illegal or which may damage the systems or harm the interests of the FNMT-RCM, clients or third parties. In the event that the installation of a new computer system or programme is necessary, it shall be carried out through the User Service Centre.

7.2 Use of the FNMT-RCM name and trademark

One of the most valuable assets is the name and trademark of the FNMT-RCM, which give confidence to customers, suppliers, the State as owner and society in general; therefore, managers and employees must take the utmost care to preserve its image, and may only use the name and trademark when they are officially representing the Entity.

It is strictly forbidden to use the FNMT-RCM name and trademark in documents, activities, business conferences, seminars, fairs and any other event that is not related to the commercial and institutional aims and objectives of the FNMT-RCM. Any use other than the above shall be previously reported through the Communication Area and authorised in accordance with the criteria and guidelines established.

The use of the name and trademark in any of the Entity's communication media shall be carried out in accordance with the rules set out in the Corporate Image Manual.

7.3 Intellectual and industrial property

A fundamental part of FNMT-RCM's business activity revolves around the use of intellectual and industrial property rights, the proper management of which is crucial. Therefore, all workers and staff subcontracted by the FNMT-RCM and whose duties are related in any way to these types of rights shall abide by the following rules:

Any agreement relating to intellectual or industrial property rights shall be performed in accordance with the regulations in force.

Before using any item that could be considered intellectual property (images or drawings) or industrial property (trademarks, names or patents), the corresponding validity shall be checked and the relevant authorisation or agreement entered into.

Material protected by intellectual and industrial property rights shall not be copied, distributed or hosted without the appropriate authorisations.

7.4 Use of email

The FNMT-RCM is the owner of the email tool and is entitled to define its use on the basis of Article 5 of the Workers' Statute, which determines the performance

by workers of the specific obligations of their jobs, and Article 20 of the above law in relation to the management and monitoring of the worker's activity, both articles extensively modulated by the jurisprudence of the Supreme Court and the doctrine of the Constitutional Court.

8. Whistleblowing channel

8.1 Purpose and scope

The purpose of the Whistleblowing Channel is to establish a communication procedure with the Compliance Committee for FNMT- RCM employees and third parties regarding conduct or facts related to an allegedly criminal action or omission, or contrary to the principles and values of this Code of Conduct or the FNMT-RCM Anti-corruption Policy.

8.1.1 Reporting non-compliance with the Compliance Management System

In this regard, the FNMT-RCM is committed to ensuring that all staff, as well as third parties, can report cases involving a risk of legal non-compliance, with complete freedom and confidence.

All complaints will be studied in depth, listening to the parties involved and ensuring that their rights are fully guaranteed (confidentiality).

If an employee becomes aware of an act that involves a breach of the Compliance Management System or of this Code of Conduct, and/or is aware of the commission of a crime within the FNMT-RCM, they shall immediately report it to their immediate supervisor or to the FNMT-RCM Management Committee / Department Head / Compliance Committee. Alternatively, if they prefer, they may use the Whistleblowing Channel, open to third parties, to report any possible legal risk or non-compliance with the controls in place to mitigate legal risks in the Entity. All compliance-related complaints received will be sent to the Compliance Committee.

The FNMT-RCM shall in all cases ensure the absolute confidentiality of the identity of the whistleblower, without prejudice to the legal obligations and protection of the rights of companies and/or persons who may be accused unfairly or in bad faith.

Any person at FNMT-RCM who reports their concerns in good faith will always be protected by the Compliance Committee and the Management Committee against any kind of retaliation.

Failure to comply with the obligation to inform the Compliance Committee is considered a serious offence and is punishable in accordance with the FNMT-RCM disciplinary system.

The Whistleblowing Channel is available to all parties concerned on the corporate website: https://www.sede.fnmt.gob.es/denuncias. The recipients of communications sent via this link are the members of the Compliance Committee, who are responsible for the subsequent investigation and resolution of the complaint. As mentioned above, whistleblowers who use the channel in good faith can be assured that no reprisals will be taken against them, even if the investigation finds that there was no infringement of the laws or regulations.

9. Related Documents

ID	TITLE
P.G.CL.00003.01	Conflicto de interés. Declaración de empleados (Conflict of interests. Employee declaration)
P.G.CL.00003.02	Conflicto de interés. Información a empleados (Conflict of interests. Information for emoloyees)
P.G.CL.00003.03	Registro de regalos y hospitalidades recibidas (Record of received gifts and hospitalities) (Modified)