

*Loose translation for information purposes only
In the event of conflict between the Spanish and the English version, the Spanish version shall prevail*

**INTERNAL CODE OF CONDUCT IN THE SECURITIES MARKETS
OF EUROLOG CANOLA SOCIMI, S.A.U.**

1 July, 2021.

INDEX

Article 1.- Object.....	3
Article 2.- Definitions	3
Article 3.- Subjective Scope of Application	5
Article 4.- Rules of conduct relating to the Affected Securities.....	6
Article 4.1.- Reporting of transactions involving Affected Securities	6
Article 4.2.- Limitations of the operations for the Affected Securities	6
Article 5. - Portfolio Management	7
Article 6.- Treatment of Inside Information.....	8
Article 6.1.- Rules of conduct.....	8
Article 6.2.- Safeguarding Inside Information	8
Article 6.3.- Disclosure of Inside Information	8
Article 6.4.- Delays in the public disclosure of Inside Information	9
Article 7.- Rules of conduct regarding Inside and Relevant Information and incorporation of Insiders Records	9
Article 7.1.- Insiders Records	9
Article 7.2.- Other information related to Inside Information and Relevant Information	10
Article 8.- Prohibition of the manipulation of the price of the Company's Affected Securities.....	11
Article 9. - Rules regarding Treasury Stock transactions.....	12
Article 10.- Liquidity contracts.....	12
Article 11.- Conflicts of interest	13
Article 15.- Personal data protection	13
Article 17.- Supervision of compliance with the Regulations.....	14
Article 18 - Updates	14
Article 19.- Breaches	14
Article 20. - Entry into force	14
ANNEX 1.....	16
ANNEX 2	18
ANNEX 3	19
ANNEX 4	22

Article 1.- Object

This Internal Code of Conduct in the Securities Markets (hereinafter, the “**Regulations**”) have been approved by EUROLOG CANOLA SOCIMI, S.A.U.'s Board of Directors (hereinafter, the “**Board of Directors**” and the **Company**’, respectively) in their meeting held on 1 July, 2021.

The purpose of these Regulations is to regulate the rules of conduct observed by the Company, its directing bodies, employees and its representatives in actions related to the stock market, pursuant to the provisions of the Regulation 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse (market abuse regulation) and repealing Directive 2003/6/EC of the European (hereinafter, the “**RAM**”) and its development regulations, the Royal Legislative Decree, 4/2015, of 23 de October, approving the Consolidated Text of the Securities Market Act (hereinafter, the “**LMV**”) and its development regulations as of its incorporation of trading into the Company Euronext's shares.

Article 2.- Definitions

For the purpose of the present Regulations the following will be understood as:

1. Directors:

The members of the Company's Board of Directors, including permanent representatives of the Directors if they are legal entities.

2. Senior Executive:

Executives, who report directly to the Board of Directors, and, in any case, any other executive who has regular access to Inside Information relating, directly or indirectly, to the Company, as well as with powers to make managerial decisions affecting the future developments and business prospects of the Company.

3. External Advisors:

Individual or legal entities, that they are not considered employees of the Company, who provide financial, legal, consulting, audit services or services of a similar nature to the Company, and thus have access to Inside Information.

4. Working Days:

Monday to Friday, except holidays in the Community of Madrid.

5. Inside Information:

Shall be deemed Inside Information any information of a specific nature that relates directly or indirectly to the Company or to one or more Affected Securities price that has not been made public and that, having become public, could significantly influence the price of said Affected Securities in an organized market or system of either contracting, or of derivative financial instruments related to them.

Information will be considered of a specific nature if it indicates a series of circumstances that occur, or that can be reasonably expected to occur, or an incident that has occurred, or that could be reasonable expected to occur, provided that this information is sufficiently specific to allow the possible effect of that series of circumstances, or that incident, on the prices of the corresponding Affected Securities, or, where applicable, of the of the derivative financial instruments related to them, to be concluded.

If this is regarding a process prolonged in time, that intends to generate, or have as a consequence,

certain circumstances or a specific incident, both these circumstances or this future incident may be considered information of a specific nature, as well the intermediate stages of the process that are linked to inciting or provoking these circumstances or this future incident.

The intermediate stage of a process prolonged in time will be considered Inside Information if, in itself, it fulfills the relative criteria of Inside Information as set out in this definition.

Similarly, it will be acknowledged that information can significantly influence price, when a reasonable investor could use said information as a basis to make investments.

6. Relevant Information:

The remaining financial or corporate information on the Company or on the Affected Securities and financial instruments that the Company must make public in Spain in compliance with any law or regulation, or information that the Company considers must be disclosed to investors due to its special interest, shall be deemed Relevant Information.

7. Insiders:

Those persons, including External Advisors, who have temporary or interim access to Inside Information of the Company because of their participation or involvement in the planning or negotiation phase of any legal or financial transaction that could significantly influence the price of any type of Affected Securities issued by the Company.

Insiders will cease to be considered as such when the Information ceases to fulfill the definition of Inside Information.

8. Applicable Parties:

The following will be considered Applicable Parties:

- a) Members of the Company's Board of Directors and, if they are not members, the Secretary and Vice-secretary of the Board of Directors, as well as, where applicable, the legal consultant for the Board of Directors (when this does not coincide with the position of Secretary).
- b) The Company's Senior Executive.
- c) The managements and employees of the Company that are determined and that work in areas related to the securities markets, or that regularly have access to Inside or Relevant Information, directly or indirectly, regarding the Company and, where applicable, the persons who form part of the financial and investor relations departments.
- d) Any other person that, by having access to Inside Information, is included in the Regulations' scope of implementation. This has been decided by the Board of Directors, given the circumstances that arise in each case.
- e) External Advisors that regularly have access to Inside or Relevant Information, directly or indirectly, regarding the Company.
- f) The Company Auditor, as the case may be.

9. Related Parties:

In relation to Applicable Parties, the following will be considered Related Persons:

- a) Spouse or any other person joined to another by an affectionate relationship similar to a conjugal one in accordance with national legislation.

- b) The children under custody.
- c) Any other relatives with whom the Applicable Person has lived or are under their care, at least a year prior to the operation in question.
- d) A legal entity, trust or association in which a party with managerial responsibilities holds a managerial position or a party mentioned in points a), b) or c), or who is directly or indirectly controlled by the said party, or that has been created to benefit the said party, or whose economic interests are largely equivalent to those of the said party;

10. Register of Applicable Parties

The register to which article 3 these Regulations refers.

11. Company:

EUROLOG CANOLA SOCIMI, S.A.U.

12. Affected Securities:

- (i) Negotiable securities issued by the Company, admitted to trading in an official secondary market, or in other regulated markets, such as in multilateral trading systems, in an organised trading system, or in other organised secondary markets.
- (ii) Financial instruments and contracts that grant the right to acquire the aforementioned securities.
- (iii) Financial instruments and contracts whose underlying assets are securities, instruments or contracts mentioned above.
- (iv) The securities, instruments and contracts of entities distinct from the Company, with respect to the Applicable Persons who have obtained Inside Information by being linked with the Company and, in any case, when the Board of Directors expressly determines, or the person or persons designated for this purpose, based on the best possible compliance with these Regulations.

Article 3.- Subjective Scope of Application

Unless otherwise indicated, these Regulations will apply to:

- (i) The Applicable Persons.
- (ii) Insiders, when expressly indicated.
- (iii) The Related Parties, when stated in current regulations.

The Applicable Parties to the current Regulations must sign the commitment of adherence of these Regulations, in accordance with the model provided in **Annex 1**.

The Related Parties, when stated in current regulations, will notify to their Related Parties of their position and the obligations that affect them.

The Board of Directors, or the person or persons designated for this purpose will, at all times, maintain updated a list of Applicable Parties that are subject to these Regulations (hereinafter, the “**Register of Applicable Parties**”) in accordance with the model provided in **Annex 2**.

The Register of Applicable Parties shall be updated immediately in the following cases:

- (i) When there is a change in the reasons why a person is included in such register.
- (ii) When it is necessary to add a new person to this register, in which case there shall be a notation of the date when such circumstance occurred.

(iii) When an Applicable Party included in the Register of Applicable Parties ceases to have such status, in which case the date when such circumstance occurs shall be noted.

The data contained in the Register of Applicable Parties must be kept for at least five (5) years from the date of creation of the register or, if subsequent thereto, from the last update thereof.

Article 4.- Rules of conduct relating to the Affected Securities

Article 4.1.- Reporting of transactions involving Affected Securities

For purposes of these Regulations, Applicable Parties are considered to have carried out transactions regarding Affected Securities, not only when said persons carry them out directly, but also when they are carried out by Related Parties.

Applicable Parties and its Related Parties are to notify the Board of Directors, or the person or persons designated for this purpose, transactions involving Affected Securities by any means allowing for the receipt thereof, and of transactions defined under article 19.7 of the RAM within three Working Days on the stock exchange subsequent to the making of the transactions, indicating the name of the person, the reason for notification, name of the Company, description of the Affected Security, the nature of the transaction, the date, the place, the price and the volume of the transaction, in accordance with the form seen in **Annex 3** of these Regulations.

The Applicable Parties (and their Related Parties) shall also be required to make the communication when the sum of all the transactions without settlement amounts to 20,000 euros within one calendar year. From that communication, the Applicable Parties and their Related Parties shall communicate each and every one of the subsequent transactions done.

Equally, the Board of Directors, or the person or persons designated for this purpose, will be able to require any Applicable Party to inform them with the sufficient detail, or to expand on the information disclosed, of any operation that could be included in these Regulations, including its position with relation to Affected Securities. Such requirement must be responded to within a seven (7) business day period.

The Board of Directors, or the person or persons designated for this purpose, will keep a record of any of the communications to which the previous sections refer.

That stated in the previous sections is understood without limiting the obligations to communicate operations regarding Affected Securities, on the part of the Directors and the Senior Directors.

The Board of Directors, or the person or persons designated for this purpose, will inform each of the individuals, to whom this section applies, of their obligation to comply with that stated herein.

Article 4.2.- Limitations of the transactions for the Affected Securities

1. The Applicable Parties will not be able to carry out transactions concerning the Affected Securities:

- a) When they have access to Inside Information or certain Relevant Information until such information becomes public.
- b) During the following periods of restricted action:
 - (i) During the thirty (30) calendar days prior to the estimated date of publication for the Company's biannual or annual results. The estimated dates of publication for the results which will be appropriately distributed shall generally be, for these purposes, the dates that the Company determines. In any case, the Applicable Parties should refrain from carrying

out operations regarding Affected Securities from the moment they are aware of the Company's economic results, until they are officially published by the Company.

- (ii) From the moment that any information concerning proposals for distributing dividends, capitals increase or decrease, or of the issue of the Company's securities is known.
 - c) When the Board of Directors, or the person or persons designated for this purpose, expressly determines it, in order to best comply with these Regulations.
2. When the Applicable Party has proven that the corresponding transaction can not be made at another time, the Board of Directors, or the person or persons designated for this purpose, may authorise transactions during the period defined in the previously point b) (i) in scenarios defined under articles 7, 8 and 9 of Commission Delegated Regulation (EU) 2016/522, of 17 December 2015 and any others defined under pertinent applicable legislation.

Article 5. - Portfolio Management

Regarding portfolio management contracts, entered into by Applicable or Related Parties with entities authorised to perform such investment services, the following rules shall apply:

1. **Content of discretionary portfolio management contracts:** Given the full understanding that such contracts grant the investment decision faculty an agent that acts in the name and on behalf of their client, but in a professional and independent manner, the Applicable or Related Parties must verify that the agreements contain clauses that establish some of the following conditions:
 - a) Express prohibition of the portfolio manager from engaging in investment transactions involving the Affected Securities.
 - b) Absolute and irrevocable guarantee that the transactions will be made without any intervention of the Applicable or Related Parties and will therefore be under the professional criteria of the manager and in accordance with criteria applied to most of the manager's clients with similar financial and investment profiles.
2. **Reporting:** The Applicable or Related Parties that formalize a discretionary portfolio management agreement shall provide to the Board of Directors a copy of the agreement within three (3) Working Days from the date of its sign. If the Board of Directors, or the person or persons designated for this purpose, were to consider, with reason, that the contract does not conform to that stated in the present section, they will notify the Applicable or Related Parties, so that the appropriate aspects of the agreement are modified. Whilst the Board of Directors, or the person or persons designated for this purpose, fails to confirm that the contract does not conform to that stated in the present section or, where appropriate, the aforementioned revision, the Applicable or their Related Parties will not authorise the agent to carry out any operation regarding the Affected Securities.
3. **Portfolio manager informed:** The Applicable or Related Parties must submit a copy of these Regulations to its portfolio manager. Additionally, the Applicable or Related Party must verify that the portfolio manager is aware of the rules of conduct to which the party is bound by these Regulations and that the manager acts accordingly. The Applicable or Related Party will be responsible for determining whether it is in his/her interest to rescind the agreement in the event of the manager's gross failure to comply with the provisions of these Regulations
4. **Previous agreements:** Agreements formalised by the Applicable or Related Parties before these

Regulations came into effect must be adapted to the provisions herein. Until the agreements have been adapted, the provisions of above point on the prohibition of transactions involving Affected Securities will be applicable.

Article 6.- Treatment of Inside Information

Article 6.1.- Rules of conduct

All parties with Inside Information, including Applicable Parties, their Related Parties and the Insider must not engage carried out, on their own behalf or the behalf of others, directly or indirectly, any of the following conducts:

- a) Preparing or carrying out any type of transactions regarding the Company's Affected Securities. The preparation and carrying out of transactions whose existence itself constitutes Inside Information, as well as transactions carried out in compliance with an obligation, already expired, to acquire or assignment such Affected Securities, are exempt, when this obligation is covered in an agreement entered into before the Applicable Party has been in possession of Inside Information.
- b) Reporting said Inside Information to third parties, except in the normal course of their work, profession or management, and with the requirements stated in these Regulations.
- c) Recommending or advising third parties, on the basis of Inside Information, on the acquisition or sale of the Company's negotiable securities or financial instruments.

For the purposes of that previously mentioned, except if the supervising entity determines that there is no legitimate reason for its fulfillment, a person subject to these Regulations, that possesses Inside Information, will not be considered to have used this information in the following cases:

- (i) Provided that said person carried out a transaction to acquire, transfer, or assignment Affected Securities, and this transaction was carried out in good faith in accordance with an expired obligation, and not to avoid the prohibition of transactions with Inside Information, and:
 - said obligation was derived from an order given or an agreement entered into before the person in question knew the Inside Information, or
 - this transactions aims to comply with a legal provision or regulation prior to the date on which the person in question knew the Inside Information.
- (ii) In general, those that are carried out in accordance with the applicable regulations.

Article 6.2.- Safeguarding Inside Information

Applicable Parties subject to these Regulations shall safeguard all the information which they are aware relating to the Company, without limiting their duty to communicate and collaborate with the judicial or administrative authorities, as per the terms established in the LMV, the RAM, and other legislation.

Additionally, said people will prevent such data or information from being the object of abuse or disloyal use, they will report cases in which this takes place before the Board of Directors and they will immediately take the necessary measures to prevent, avoid, and, where applicable, to correct consequences that, from this, could arise.

Article 6.3.- Disclosure of Inside Information

The Company shall inform the public as soon as possible of Inside Information which directly concerns it in a manner which enables fast access and complete, correct and timely assessment of the

information by the public. The contents of the communication must be true, clear and complete, such that it must not be misleading or deceptive.

Reporting of Inside Information shall be published on the Company's corporate website at the same time with the disclosure of such information through the regulator.

The Company shall post and maintain on its website for a period of at least five (5) years, all Inside Information it is required to disclose publicly.

The Insiders and the Applicable Parties will endeavour, with the utmost diligence, to adequately conserve the documents which contain Inside Information and maintain their confidential character, such that the usual price of the negotiable securities or financial instruments cannot be affected by third party knowledge.

Article 6.4.- Delays in the public disclosure of Inside Information

Notwithstanding the above, the Company may delay, under its own responsibility, the public disclosure of Inside Information provided that:

- a) The immediate disclosure of the information may harm the Company's legitimate interests.
- b) The delay in disclosure must not be misleading or deceptive.
- c) The Company must be able to guarantee the confidentiality of the information.

The Company may also, under its own responsibility, postpone the public disclosure of Inside Information related to a process prolonged in time, that is developed in particular stages, with which it hopes to generate or result in certain circumstances or a particular incident, subject to the conditions indicated in the previous paragraph.

In order to determine if public disclosure of the Inside Information will be postponed, the recommendations and guidelines that, in this matter, may be issued by the official supervisory bodies of the securities markets, will be taken into consideration, where applicable.

If public disclosure of the Inside Information has been postponed, its confidentiality is no longer guaranteed, and the Company will make this information public as soon as possible.

Article 7.- Rules of conduct regarding Inside and Relevant Information and incorporation of Insiders Records

Article 7.1.- Insiders Records

During the stages of research or negotiation of any legal or financial operation the disclosure of which may significantly influence the trading prices of the Affected Securities issued by the Company:

- a) The knowledge of Inside Information will be strictly limited to those people, internal or external to the organisation, to which it is essential.
- b) The Board of Directors, or the person or persons designated for this purpose, will set up and keep an up-to-date record of insiders, for each legal or financial transaction that could significantly influence the price of any type of Affected Securities issued by the Company, which will include the following information:
 - i. The identity of the Insiders.
 - ii. The reason for which each person has been included in these Insiders Records.
 - iii. The date and time in which the Insiders gained access to the Inside Information.

iv. The dates of formation and updates of said Insiders Records.

This Insiders Record must be immediately updated in the following cases:

1. When there is a change in the reasons for which a person is included in said Record.
2. When a new person must be added to the record, in which case the date of this situation's occurrence will be recorded.
3. When a person listed in the Insider Records no longer has access to Inside Information, in which case the date of this situation's occurrence will be recorded.

The information registered in the Insider Records will be kept for at least five (5) years from the date of its formation, or if applicable, from the date of its last update.

- c) The content and format of the Insider Records will be edited according to the applicable regulations. In any case, the Insider Records will be made and maintained up-to-date in an electronic format according to the templates in **Annex 4**.
- d) The Board of Directors, or the person or persons designated for this purpose, shall take all reasonable steps to ensure that any person on the insider list acknowledges in writing the legal and regulatory duties entailed and is aware of the sanctions applicable to insider dealing and unlawful disclosure of inside information.
- e) Additionally, it will expressly warn the persons included in the Insider Records of the confidential nature of the information, and of their duty of confidentiality with respect to said information, as well as the prohibition of its use, and of the infringements and sanctions that, where applicable, would result from its improper use. Also, the Board of Directors, or the person or persons designated for this purpose, must inform the parties regarding their inclusion in the Insider Records, and of the other information stated in the Personal Data Protection regulations.
- f) The necessary security measures will be put into place, to ensure the safekeeping, filing, accessing, copying and distributing of the Inside and Relevant Information, in accordance with the restrictive rules contained in these Regulations.

Article 7.2.- Other information related to Inside Information and Relevant Information

The Board of Directors, or the person or persons designated for this purpose, will monitor the market evolution of the Affected Securities issued by the Company, and the news that the professional diffusers of economic information and the media distribute that could affect them.

In the event of abnormal performance of trading volumes or trading prices, and when there are reasonable indications that the performance is caused by premature, partial or distorted disclosure of Inside Information, the Board of Directors, or the person or persons designated for this purpose, will take the necessary measures to ensure the immediate disclosure the Inside Information or the Relevant Information. Notwithstanding the above, the Company may delay disclosure to the public of the Inside Information, in accordance with the provisions of section 6.4.

Additionally, the Applicable Parties who are aware of any Inside or Relevant Information will be required:

- a) To safeguard this information, without limiting their duty to communicate and collaborate with the judicial and administrative authorities, as per the terms established in the LSM and other legislation.
- b) To take the adequate measures to prevent such information from being the object of abuse or

disloyal use.

- c) To immediately communicate with the Board of Directors regarding any abuse or disloyal use of Inside or Relevant Information of which they are aware.
- d) To monitor the correct implementation of the data protection legislation within the Company, and to take the adequate measures to prevent this Inside or Relevant Information, which contains personal data, from being used in any way contrary to the terms stated in the data protection legislation.

The Communications of Relevant Information will be available via the corporate Company website as soon as the Euronext have been notified.

The Board of Directors, or the person or persons designated for this purpose, will regularly supervise the contents of the corporate Company website to ensure it is adapted to the aforementioned requirements and, in general, to all the reporting requirements needed of them as a listed company.

In order to ensure that Relevant Information and Inside Information be disclosed to the market uniformly and fairly, the Applicable Parties and Insiders will abstain from providing analysts, shareholders, investors or press Relevant Information and Inside Information, with which the general market has not been previously or simultaneously provided.

The Applicable Parties will endeavour, with the utmost diligence, to adequately conserve the documents containing Inside Information and Relevant Information and maintain their strictly confidential character, such that the usual price of the Affected Securities cannot be affected by third party knowledge.

In order to ensure the confidentiality of the aforementioned information, the Company (i) will deny access to said information to persons other than those who need it to carry out of their work; (ii) it will guarantee that the persons who have access to this information know the legal obligations that this implicates, and that they are aware of the sanctions applicable for improper or inappropriate use of the information; and (iii) it will immediately disclose this information if it cannot guarantee its confidentiality.

Article 8.- Prohibition of the manipulation of the price of the Company's Affected Securities

The Applicable Parties must not prepare or engage practices that could distort the free formation of the trading prices of the Company's Affected Securities, such as:

- a) making a transaction, placing a trade order or engaging in any other conduct that:
 - (i) gives, or is likely to give, false or misleading signals as to the supply of, demand for. or price of the Affected Securities, or;
 - (ii) secures, or is likely to secure the trading price of one or more Affected Securities at an abnormal or artificial level.

Unless the person entering into a transaction, placing an order to trade or engaging in any other behavior establishes that such transaction, order or behaviour have been carried out for legitimate reasons, and conform with an accepted market practice.

- b) entering into a transaction, placing an order to trade or any other activity or behaviour which affects or is likely to affect the price of one or more Affected Securities and Instruments by employing a fictitious device or any other form of deception or contrivance;
- c) disseminating information through the media, including the internet, or by any other means, which

gives, or is likely to give, false or misleading signals as to the supply of, demand for, or price of one or more of the Affected Securities and Instruments of the Company, including the dissemination of rumours, where the person who made the dissemination knew, or ought to have known, that the information was false or misleading;

- d) transmitting false or misleading information or providing false or misleading inputs in relation to a benchmark where the person who made the transmission or provided the input knew or ought to have known that it was false or misleading, or any other behaviour which manipulates the calculation of a benchmark.

Article 9. - Rules regarding Treasury Stock transactions

1. For the purpose of these Regulations, treasury stock transactions are defined as those that are made by:
 - a) The Company.
 - b) A third party with express or implied command from the Company, and, in particular, those that act as liquidity provider, by virtue of the contract entered into.

That are based on the Company's shares, financial instruments or contracts of any kind, whether or not they are traded in organised secondary markets; and that entitle buyers to the acquisition of shares of the Company or whose underlying assets are the shares of the Company.

2. The operations of the treasury stock will always have legitimate purposes, such as, amongst others, providing investors with the appropriate liquidity and depth in the trading of Company shares, implementing purchasing programs for own shares, which have been approved by the Board of Directors, or in an agreement in a General Shareholders' Meeting, complying with previously contracted legitimate agreements, or any other acceptable purposes in accordance with the applicable regulations. Under no circumstances will the operations of the treasury stock respond to an attempt to intervene in the free price formation process resulting in a large volume of deceitful signals, that could make the supply or demand volume of Company shares appear higher than would result from the free play of supply and demand, and could mislead the investor concerning their degree of liquidity.
3. Company's treasury stock transactions must never be made on the basis of Inside Information.
4. Management of treasury stock must be completely transparent insofar as relations with supervisors and market authorities.
5. In its treasury stock transactions, the Company must observe the provisions of this article and all obligations and requirements deriving from applicable legislation.
6. In any case, the treasury stock transactions must respect the limits and restrictions that arise from the liquidity contract, which the Company endorses, as the case may be.
7. Efforts will be made to ensure that the treasury stock management are cut off from the rest of the company's activities.
8. In the case that an urgent need to adequately protect the interests of the Company, the Board of Directors will be able to grant a temporary modification or suspension of the aforementioned regulations' applicability, for those that are not enforced by the applicable legal framework.

Article 10.- Liquidity contracts

Should the Company enter into a liquidity contract with a member of the market, it must observe the legislation as stated in the applicable regulations regarding liquidity contracts, in order to ensure its acceptance as market practice.

Article 11.- Conflicts of interest

1. Conflict of interest will be understood as the collision between the interests of the Company and the personal interests of the Applicable Party or its Related Parties
2. It will be considered that a Conflict of Interest exist when the Applicable Party has one of the following conditions concerning the entities to which this article refers:
 - a) Is the Director or Senior Executive.
 - b) Has a significant shareholding (in accordance with the percentage held, as defined under applicable law at all times).
 - c) Has family relationships that are up to the second degree by affinity or the third degree by consanguinity with his/her management, the significant shareholders of his/her capital or Senior Management.
 - d) Maintains relevant, direct or indirect contractual relationships.
3. In the case of a conflict of interest, the following guidelines shall be observed:
 - a) Independence: acting, at all times, with loyalty toward the Company and without regard to their own interests or the interests of others.
 - b) Abstention: avoid interfering in or influencing the taking of decisions that may affect the individuals or entities involved in Conflicts of Interest, and they must avoid accessing Relevant Information that may have a bearing on a conflict of interest.
 - c) Communication: informing on conflicts of interest in which the Board of Directors, or the person or the persons designated for this purpose, are involved in.

Any questions regarding the possibility of a conflict of interests must be addressed to the Board of Directors, or with the person or persons designated for this purpose.

Article 15.- Personal data protection

The Company and the Applicable Parties will ensure respect of the fundamental right to the personal data protection, in the terms provided in the applicable regulation, of the members, employees and any other individuals or representatives of legal persons that are connected to the Company and for whose data the Company is responsible.

In particular, and in a non-exhaustive manner, the Applicable Parties:

- a) Will deal exclusively with the personal data that is made available in accordance with the instructions of the Company.
- b) Will not administer or use personal data for any purpose other than in compliance with their own work corresponding to the role or position that links them to the Company.
- c) Will comply with the applicable documentary, technical and organisational security measures.
- d) Will observe the strictest confidentiality and duty of secrecy concerning personal data, and will not communicate this data to any other person (including subcontractors), not even for their

conservation, in accordance with the instructions of the Company.

- e) Will immediately inform the Board of Directors, or the person or persons designated for this purpose, of any request that they have received to access, rectify, cancel and oppose, and of all information that they have available that is relevant to guarantee the effective exercising of these rights, such that the Company can deal with the request it concerns in the short time legally provided.

Article 17.- Supervision of compliance with the Regulations

The Board of Directors, or the person or persons designated for this purpose, are considered responsible for supervising the effective compliance with the obligations listed in the present Regulations, to which end the following powers are recognised:

- a) Complying with and enforcing the rules of conduct of the securities markets and the regulations of these Regulations, its procedures, and other complementary present or future legislation.
- b) Promoting awareness of the Regulations and of other rules of conduct for the securities markets by Applicable Parties and Insiders.
- c) Developing, where applicable, development procedures and regulations that are deemed appropriate for the application of the Regulations.
- d) Interpreting the regulations contained in the Regulations and resolving problems and questions that arise from the Applicable Parties.
- e) Instructing the Applicable Parties on disciplinary proceedings for non-compliance with the regulations of the present Regulations.
- f) Requesting any data or information that is considered necessary by the Applicable Parties.
- g) Establishing the reporting requirements, control regulations, and other measures that they consider appropriate.

The Board of Directors, or the person or persons designated for this purpose, will have all necessary powers to execute their functions, especially in being able to, amongst other things, request any data from the Applicable Parties or information that they consider necessary and establish the reporting requirements, control regulations, and other measures that are considered appropriate.

Article 18 - Updates

The present Regulations will be updated by the Board of Directors whenever it is necessary to adapt its contents to fit the current applicable provisions.

Article 19.- Breaches

- a) A breach of that stated in the Regulations will result in the corresponding liability, according to the nature of the connection that the non-compliant party maintains with the Company.
- b) That aforementioned will be understood without prejudice to the administrative responsibility resulting from the disciplinary system of the LMV, the Regulation of Market Abuse, and any other liabilities that could result from civil or criminal legislation.

Article 20. - Entry into force

1. The present Regulations has an indefinite validity and will enter into force the day following its approval by the Board of Directors. It will be revised and updated periodically, such that it may be

adjusted to fit the subsequent regulatory requirements, and to offer the best practices in the field.

2. The Board of Directors, or the person or persons designated for this purpose, will inform the Applicable Parties of this, ensuring that the contents of the present Regulations is known, understood and accepted by all persons linked with the Company where applicable.

ANNEX 1

**COMMITMENT TO ADHERE TO THE INTERNAL CODE OF CONDUCT IN THE
SECURITIES MARKETS OF EUROLOG CANOLA SOCIMI, S.A.U.**

EUROLOG CANOLA SOCIMI, S.A.U.

Calle Nanclares de Oca 1 - B,
28022 Madrid. Spain

To the attention of the Board of Directors

Dear Sir or Madam:

The undersigned,, with the tax identification number, stated that he/she has received a copy of the Internal Code of Conduct in Securities Markets of EUROLOG CANOLA SOCIMI, S.A.U. (the "**Regulations**"), expressly states that he/she agrees with its rules *[and that he/she has notified in writing all respective Related Parties of the obligations deriving from these Regulations¹]*.

The undersigned also states that he/she holds directly or indirectly the following Affected Securities (as defined in the Regulations):

Nature of Security	Issuer	Direct Securities	Indirect Securities (*)

(*) Held Through:

Name of direct holder of the Security	Tax identification number of the direct holder of the Security	Issuer	Number

In addition, the undersigned declares that he/she has been informed that:

¹ To be eliminated when Applicable Party has no Related Parties.

1. Pursuant to the provisions of the restated text of the Securities Market Act approved by Royal Legislative Decree 4/2015 of 23 October (the “**LMV**”), the improper use of the Inside Information to which he/she may have access, as well as a breach of the other obligations provided for in the Regulations, might amount to a serious or very serious infringement or the crime of abuse of inside information in the stock exchange market contemplated in Articles 285, 285 bis, 285 ter and 285 quater of Implementing Law 10/1995 of 23 November of the Criminal Code (the “**Criminal Code**”).
2. The improper use of Inside Information, as well as a breach of the other obligations provided for in the Regulations, may be punished in the manner provided for by Sections 302 and 303 of the LMV and by Articles 285, 285 bis and 285 quater of the Criminal Code, with fines, special disqualifications, public reprimands, removal from office and imprisonment.
3. Improper use of privileged information, as well as the breach of current obligations stated in the Code, could be sanctioned in the manner stated in article 30 of the Code 596/2014 of the European Parliament and of the Council, of the 16th of April 2014, regarding market abuse and its development regulations.
4. Pursuant to the provisions of Regulation (EU) 2016/679 of 27 April 2016 and Implementing Law 3/2018 of 5 December on the Protection of Personal Data and guarantee of digital rights, the undersigned declares that he/she has been informed that his/her data of a personal nature contained in this statement and provided subsequently on occasion of the notifications made in compliance with the Regulations will be processed under the responsibility of EUROLOG CANOLA SOCIMI, S.A.U., for purposes of (i) the implementation and control of the provisions of the Regulations, and (ii) compliance with legal obligations. The processing is necessary for such purposes and the legal basis is compliance with legal obligations.
5. The undersigned has been informed that his/her personal data may be communicated to government agencies, to comply with legal obligations of EUROLOG CANOLA SOCIMI, S.A.U., that his/her personal data will be maintained for so long as he/she is considered an Affected Person by the Board of Directors and that, after said period, said personal data will be maintained until the passage of the limitations period on potential legal actions.
6. In addition, the undersigned declares that he/she has been informed that he/she may exercise the rights of access, rectification, deletion, limitation, portability or opposition, based on the provisions of applicable law in connection therewith, by contacting EUROLOG CANOLA SOCIMI, S.A.U. in writing at the address set forth above. The undersigned also declares that he/she has been informed of the right thereof to file a claim with the Spanish Data Protection Agency.

In..... on the of 20.....

Signed:

ANNEX 2

PERMANENT INSIDERS SECTION OF THE INSIDER LIST (THAT IS, APPLICABLE PARTIES)

- Date and time (of creation of the permanent insiders section) [yyyy-mm-dd, hh:mm UTC (Coordinated Universal Time)]
- Date and time (last update): [yyyy-mm-dd, hh:mm UTC (Coordinated Universal Time)]
- Date of transmission to the competent authority: [yyyy-mm-dd]

First name of the inside	[Text]
Surname of the insider	[Text]
Birth surname of the insider (if different)	[Text]
Professional telephone number (work direct telephone line and work mobile numbers)	[Numbers (no space)]
Company name and address	[Address of issuer/emission allowance market participant/ auction platform/auctioneer/auction monitor or third party of insider]
Function and reason for being insider	[Text describing role, function and reason for being on this list]
Obtained (the date and time at which a person obtained access to inside information)	[yyyy-mm-dd, hh:mm UTC]
Ceased (the date and time at which a person ceased to have access to inside information)	[yyyy-mm-dd, hh:mm UTC]
Date of birth	[yyyymm-dd]
National Identification Number (if applicable)	[Number and/or text]
Personal telephone numbers (home and personal mobile telephone numbers)	[Numbers (no space)]
Personal full home address: street name; street number; city; post/ zip code; country)	[Text: detailed personal address of the insider — Street name and street number — City — Post/zip code — Country]

ANNEX 3

TEMPLATE FOR NOTIFICATION AND PUBLIC DISCLOSURE OF TRANSACTIONS BY PERSONS DISCHARGING MANAGERIAL RESPONSIBILITIES AND PERSONS CLOSELY ASSOCIATED WITH THEM (THAT IS, APPLICABLE PARTIES)

- Date and time (of creation of section of parties with ongoing access to Inside Information) [year-mn-dy, hr:mn UTC (Coordinated Universal Time)]
- Date and time (most recent update): [year-mn-dy, hr:mn UTC (Coordinated Universal Time)]
- Date of submission to competent authority: [year-mn-dy]

1	Details of the person discharging managerial responsibilities/person closely associated	
a)	Name	<p><i>[For natural persons: the first name and the last name(s).]</i></p> <p><i>[For legal persons: full name including legal form as provided for in the register where it is incorporated, if applicable.]</i></p>
2	Reason for the notification	
a)	Position/status	<p><i>[For persons discharging managerial responsibilities: the position occupied within the issuer, emission allowances market participant/auction platform/auctioneer/auction monitor should be indicated, e.g. CEO, CFO.]</i></p> <p><i>[For persons closely associated,</i></p> <p style="margin-left: 20px;"><i>— An indication that the notification concerns a person closely associated with a person discharging managerial responsibilities;</i></p> <p style="margin-left: 20px;"><i>— Name and position of the relevant person discharging managerial responsibilities.]</i></p>
b)	Initial notification/ Amendment	<i>[Indication that this is an initial notification or an amendment to prior notifications. In case of amendment, explain the error that this notification is amending.]</i>
3	Details of the issuer, emission allowance market participant, auction platform, auctioneer or auction monitor	
a)	Name	<i>[Full name of the entity.]</i>
b)	LEI	<i>[Legal Entity Identifier code in accordance with ISO 17442 LEI code.]</i>
4	Details of the transaction(s): section to be repeated for (i) each type of instrument; (ii) each type of transaction; (iii) each date; and (iv) each place where transactions have been conducted	

a)	Description of the financial instrument, type of instrument Identification code	<p><i>[— Indication as to the nature of the instrument:</i></p> <ul style="list-style-type: none"> - <i>a share, a debt instrument, a derivative or a financial instrument linked to a share or a debt instrument;</i> - <i>an emission allowance, an auction product based on an emission allowance or a derivative relating to an emission allowance.</i> <p><i>— Instrument identification code as defined under Commission Delegated Regulation supplementing Regulation (EU) No 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards for the reporting of transactions to competent authorities adopted under Article 26 of Regulation (EU) No 600/2014.]</i></p>	
b)	Nature of the transaction	<p><i>[Description of the transaction type using, where applicable, the type of transaction identified in Article 10 of the Commission Delegated Regulation (EU) 2016/522 (1) adopted under Article 19(14) of Regulation (EU) No 596/2014 or a specific example set out in Article 19(7) of Regulation (EU) No 596/2014.</i></p> <p><i>Pursuant to Article 19(6)(e) of Regulation (EU) No 596/2014, it shall be indicated whether the transaction is linked to the exercise of a share option programme.]</i></p>	
c)	Price(s) and volume(s)	Price(s)	Volume (s)
		<p><i>[Where more than one transaction of the same nature (purchases, sales, lendings, borrows, ...) on the same financial instrument or emission allowance are executed on the same day and on the same place of transaction, prices and volumes of these transactions shall be reported in this field, in a two columns form as presented above, inserting as many lines as needed.</i></p> <p><i>Using the data standards for price and quantity, including where applicable the price currency and the quantity currency, as defined under Commission Delegated Regulation supplementing Regulation (EU) No 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards for the reporting of transactions to competent authorities adopted under Article 26 of Regulation (EU) No 600/2014.]</i></p>	

d)	<p>Aggregated information</p> <ul style="list-style-type: none"> — Aggregated volume — Price 	<p><i>[The volumes of multiple transactions are aggregated when these transactions:</i></p> <ul style="list-style-type: none"> <i>— relate to the same financial instrument or emission allowance;</i> <i>— are of the same nature;</i> <i>— are executed on the same day; and</i> <i>— are executed on the same place of transaction.</i> <p><i>Using the data standard for quantity, including where applicable the quantity currency, as defined under Commission Delegated Regulation supplementing Regulation (EU) No 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards for the reporting of transactions to competent authorities adopted under Article 26 of Regulation (EU) No 600/2014.]</i></p> <p><i>[Price information:</i></p> <ul style="list-style-type: none"> <i>— In case of a single transaction, the price of the single transaction;</i> <i>— In case the volumes of multiple transactions are aggregated: the weighted average price of the aggregated transactions.</i> <p><i>Using the data standard for price, including where applicable the price currency, as defined under Commission Delegated Regulation supplementing Regulation (EU) No 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards for the reporting of transactions to competent authorities adopted under Article 26 of Regulation (EU) No 600/2014.]</i></p>
e)	Date of the transaction	<p><i>[Date of the particular day of execution of the notified transaction.</i></p> <p><i>Using the ISO 8601 date format: YYYY-MM-DD; UTC time.]</i></p>
f)	Place of the transaction	<p><i>[Name and code to identify the MiFID trading venue, the systematic internaliser or the organised trading platform outside of the Union where the transaction was executed as defined under Commission Delegated Regulation supplementing Regulation (EU) No 600/2014 of the European Parliament and of the Council with regard to regulatory technical standards for the reporting of transactions to competent authorities adopted under Article 26 of Regulation (EU) No 600/2014, or</i></p> <p><i>if the transaction was not executed on any of the above mentioned venues, please mention 'outside a trading venue'.]</i></p>

(1) Commission Delegated Regulation (EU) 2016/522 of 17 December 2015 supplementing Regulation (EU) No 596/2014 of the European Parliament and of the Council as regards an exemption for certain third countries public bodies and central banks, the indicators of market manipulation, the disclosure thresholds, the competent authority for notifications of delays, the permission for trading during closed periods and types of notifiable managers' transactions (see page 1 of this Official Journal).

ANNEX 4

Template for the insider list to be submitted by issuers of financial instruments admitted to trading on SME growth markets

- Date and time (creation): [yyyy-mm-dd, hh:mm UTC (Coordinated Universal Time)]
- Date of transmission to the competent authority: [yyyy-mm-dd]

First name of the insider	[Text]
Surname of the insider	[Text]
Birth surname of the insider (if different)	[Text]
Professional telephone number (work direct telephone line and work mobile numbers)	[Numbers (no space)]
Professional telephone number (work direct telephone line and work mobile numbers)	[Address of issuer or third party of insider]
Function and reason for being insider	[Text describing role, function and reason for being on this list]
Obtained (the date and time at which a person obtained access to inside information)	[yyyy-mm-dd, hh:mm UTC]
Obtained (the date and time at which a person obtained access to inside information)	yyyy-mm-dd, hh:mm UTC]
National Identification Number (if applicable) Or otherwise date of birth	[Number and/ or text or yyyymm-dd for the date of birth]
Personal full home address (street name; street number; city; post/zip code; country) (If available at the time of the request by the competent authority)	[Text: detailed personal address of the insider — Street name and number — City — Post/zip code — Country]
Personal telephone numbers (home and personal mobile telephone numbers) (If available at the time of the request by the competent authority)	[Numbers (no space)]

Loose translation for information purposes only
In the event of conflict between the Spanish and the English version, the Spanish version shall prevail