



ETHICAL CODE



VERSION CONTROL

Version 0	2016
Version 1	2019
Version 2	2021

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PREAMBLE

Within the current framework of the growing development of Corporate Social Responsibility, CADIZ SAD wishes to strengthen relationships of trust and reinforce good business practices with our stakeholders, as we consider it one of the most basic sources of value generation.

The organisation assumes a great responsibility for the integrity and reputation of football and sport in general. All this without neglecting the achievement of its own business objectives as a commercial organisation.

The purpose is to ensure professional, ethical and responsible behaviour in the development of the organisation's activities, maintaining a zero tolerance policy towards any conduct and/or practices that are illegal, immoral or contrary to good practices that damage the image of football.

The conduct of persons subject to the code of ethics must be identified at all times with the principles and objectives of the organisation, ensuring its dissemination, knowledge and compliance.

As a sporting body we consider fair play to be essential, whose principles we uphold and promote as well as a corporate culture based on the integrity of our behaviour in line with the corporate image and reputation we wish to project to the Communities in which CADIZ SAD operates.

The present Ethical Code is fundamentally inspired by various RFEF and FIFA regulations on integrity and good practice.

The organisation will develop a crime prevention system by articulating as many codes, regulations, policies and instructions as deemed necessary.

Every Person related to the Club must read, know, respect and subscribe to this Code of Ethics, declaring their express renunciation of carrying out any type of activity that could be contrary to these principles, as well as avoiding methods and practices that are illegal, immoral or contrary to ethical principles or that could tarnish or damage the image or reputation of our Club.

The principles established in the present Ethical Code will be through the Protocols, Regulations and control mechanisms incorporated into the organisation's Compliance system and any others that may be incorporated in the future.

DEFINITIONS

Conflict of interest Any decisions taken in the duties inherent to their position in the organisation must be in the interest of CÁDIZ CF and not out of personal interest or relationship.

A conflict of interest may arise if persons connected with the Club have, or give the impression of having, private or personal interests that impair the performance of their duties independently and with integrity.

Most potential conflicts of interest, whether apparent or real, can be avoided or resolved by disclosure to the Club. In case of doubt, the Compliance Body should be consulted and decided upon.

Private or personal interest Private or personal interests are understood as all possible agreements that benefit oneself or a third party, relatives, friends or any acquaintance.

Attempt Execution of infringing conduct that does not materialise

Corruption Concealed abuse of a position of power, whether in the public or private sector, for personal gain.

Loyalty Sentiment of respect, fidelity and commitment of principal moral to moral principles commonly accepted by society..

Harassment Systematic and repeated assaults, whether personal or otherwise, directed against a person and intended to isolate or exclude that person, whose dignity is affected.

Sexual Harassment¹ Any form of unwanted verbal, non-verbal or physical conduct of a sexual nature that has the purpose or effect of violating the dignity of a persona, in particular when such conduct creates an intimidating, hostile, degrading, humiliating or offensive environment.

¹ Definition agreed in the Council of Europe Convention on preventing and combating violence against women and domestic violence (Istanbul Convention).

Situation of privilege State of exclusive or special advantage that someone enjoys by virtue of being in a certain circumstance or position within the organisation vis-à-vis third parties.

Fair play Behaviour of integrity, correctness and respect for the spirit of sport. Fraud in competition and sporting results must be eliminated, as well as doping as a way of adulterating the performance of players and undermining their health.

The Club censures any expression, scream or chant aimed at insulting or insulting any person, club or institution, with the personal safety and wellbeing of all stakeholders being the top priority of CÁDIZ CF.

Social media It includes all online communication exchange platforms whose content is created by the users themselves, such as Whatsapp, Facebook, Instagram, Twitter,

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LinkedIn or similar, as well as on any website, either directly as a publication or in its comments.

**Shielding
against
retaliation**

Retaliation against persons who report possible wrongdoing, or who appear as witnesses or assist or participate in an investigation of any regulatory non-compliance, is expressly prohibited.

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FIRST TITLE. – SCOPE OF APPLICATION

Article 1. Objective.

The purpose of this Code is to regulate the principles and rules governing the development of the organisation's activities, maintaining a policy of zero tolerance towards any conduct and/or practices that are illegal, immoral or contrary to good social and sporting practices that damage the image of football.

It also regulates the regime, procedure for action and composition of the bodies responsible for its supervision and control.

Disciplinary sanctions are foreseen for any breach of the provisions of this Code and the Protocols and Controls, in accordance with the applicable Collective Agreements, the Club's Disciplinary Regulations and the Internal Regulations.

Article 2. Subjective.

This Code shall apply to all persons related to the Club, whether they are employees or otherwise, including members of the administrative and management bodies of the company, all employees of CÁDIZ CF SAD (including all those who are part of the sporting bodies), suppliers, contractors and collaborators, and in general any person who may be included within the concept of a stakeholder or target audience.

Article 3. Temporal.

This Code shall apply to all conduct covered by this Code from the time of its entry into force.

Article 4. Sanctioning regime.

CÁDIZ CF stipulates an internal disciplinary sanctioning regime for conduct contrary to this Code and the internal Compliance regulations that develop it. The application of this system involves disciplinary measures that may consist of a reprimand, warning or even termination of the working relationship or collaboration between the Club and the offender. In the case of infractions that could involve a crime or administrative liability, the Club may report the conduct to the competent authorities.

Article 5.- Subsidiary norms and Legal Loopholes.

01. Subsidiary rules are considered to be all those deriving from the FIFA code of ethics, the RFEF code of ethics, as well as the doctrine and jurisprudence in sporting matters.
02. In disciplinary matters, the applicable Collective Bargaining Agreement and the Workers' Statute are considered subsidiary rules,
03. Any administrative or criminal rules which may arise from the investigation shall also apply.
04. In the case of legal loopholes, they shall be resolved in accordance with local custom and practice, provided that these do not conflict with other legal provisions or those voluntarily assumed by the organisation.

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SECOND TITLE. – RULES, PRINCIPLES AND OBLIGATIONS

First chapter. General rules of conduct

Article 6. General rules of conduct.

01. Persons subject to this Code are obliged to observe all applicable laws and regulations.
02. Any action or abuse aimed at obtaining illegitimate personal benefits or advantages that generate benefits for oneself or the organisation is strictly prohibited.
03. Persons subject to the present Code shall acknowledge the importance of their role, duties and responsibilities involved.
04. All actions that involve conflicts of competition or interest with the organisation are strictly forbidden, with interest being understood to be any activity that the Club carries out in pursuit of its aims.

Second Chapter. Principles

Article 7. Confidentiality.

01. Persons subject to this Code shall act with absolute loyalty to the organisation, treating all information they receive in the course of their duties as confidential or secret.
02. In general, any information that is not classified and identified as public is considered confidential.
03. The different Protocols and Regulations set up by CÁDIZ CF regarding the treatment of information and its confidentiality of the same develop the necessary controls for the organisation to keep the information protected and stored in a safe place, whatever its format, physical or electronic, against any internal or external risk of non-consensual access, manipulation or destruction, whether intentional or accidental.
04. In the event of termination of the employment relationship, the employee shall return all confidential information in his possession, including documents and storage media or devices, as well as information stored on his computer terminal. The obligation of confidentiality shall survive the termination of the employment relationship.

Article 8. Integrity and Non-discriminatory.

01. The integrity of every individual shall be respected and safeguarded, guaranteeing the protection of the personal rights of each individual.
02. The integrity of individuals will be safeguarded, rejecting any kind of intimidating, discriminatory, offensive or offensive conduct that does not respect the rights of workers, as well as any manifestation of sexual or moral harassment or abuse of authority of any kind.

Artículo 9. Collaboration and prohibition of retaliation.

01. Persons subject to this Code must report to the Compliance Body any suspicion or possible contravention of this Code or any action that is contrary to the ethical values and internal regulations of the organisation, through the channels defined in the Club's Whistleblowing Channel Policy (cumplimiento@cadizcf.es).
02. Failure to comply with the duties of collaboration will entail a disciplinary sanction. The following will be sanctioned:

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The concealment of those who have breached, are breaching or will breach the precepts of the Code will be sanctioned.

03. The report will be treated confidentially and secretly, protecting the privacy and dignity of the persons involved and ensuring protection against retaliation, unless the internal investigation determines that the report is false or has been made with reckless disregard for the truth, in bad faith or abuse of rights.
04. Disciplinary measures will be applied to those responsible for retaliatory actions if proven.
05. The rights, obligations and procedures of the complaints channel are set out in the Complaints Channel Regulations and in the Compliance Body Regulations.

Article 10. Complaint, investigation and sanction procedure.

01. In the event that there are indications of a violation of the Code of Ethics, whether attempted or completed, the investigation and sanction procedure developed in the Complaints Channel Regulations will be followed.
02. The sanctions established in the Disciplinary Regulations or any other applicable sanctioning regulations shall apply.
03. If there are indications that could be considered criminal, they will be brought to the attention of the judicial authorities, who will cooperate fully with the investigation.

Artículo 10.- Complaints Channel.

01. The Complaints Channels is established as a means of detecting possible breaches of the Code of Ethics and the other rules of the Compliance Policy.
02. The complaints channel is the mechanism provided by the club to report reasonable indications of illegal actions or actions contrary to those established in this Code or any other internal regulations or values of CÁDIZ CF.
03. The channels, the rights and obligations of complainants and those being reported shall be set out in the Complaints Channel Policy. This document shall be accessible to all parties affected by this Code.

Third Chapter. Obligations

Article 11. Refusal of gifts and/or offers outside customs and practices.

01. Gifts or other benefits may only be offered to or accepted from persons who form part of or are linked to stakeholders, for an amount of less than **100.00 €**.

In the event of receiving a gift or offering a gift in the Club's commercial or sporting relations in excess of €100.00, the Compliance Officer must be notified in writing and prior authorisation to accept it must be requested.

02. The giving or receiving of money in cash or in any other form is strictly prohibited.
03. Any benefit, offer or gift that is not quantifiable in financial terms may be accepted provided that:
 - a. Its value is symbolic and/or irrelevant.
 - b. They do not derive indirect economic benefits that are considered improper or of any other nature.
 - c. Do not cause a conflict of interest.

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04. Any gift or gratuity that does not meet the established criteria shall be reported and handed over to the Compliance Department. The Compliance Department shall either reject the gift or carry out a raffle or donation among employees, in accordance with specific protocol or instructions from the Board of Directors.
05. The resale of tickets, season tickets or invitations to events organised and/or in which the Club participates is prohibited.
06. Fraudulent promotion of access to sporting events is prohibited.
07. Invitations, trips or any kind of gift or present to an authority or public official may not be accepted or solicited without the prior authorisation of the Compliance Officer.
08. The Club's Protocol for Attention, Gifts and Presents sets out the controls in place to prevent these practices and regulates the organisation's uses and customs.

Article 12. Rejection of conduct that classifies as Bribery and Corruption.

01. It is strictly forbidden to give, offer, promise or accept, directly or indirectly, any personal, financial or other benefits that may be considered improper for the purpose of obtaining or maintaining an illegitimate business.
02. It is strictly prohibited to give, offer, promise or accept, directly or indirectly, to a third party for the purpose of influencing the performance or non-performance of an act in connection with his or her official activities or contrary to his or her duties.
03. It is strictly forbidden any action aimed at predetermining or altering, in a deliberate and fraudulent manner, any circumstance inherent to the development of a match or competition in which CÁDIZ CF participates (result, number of cards, corner kicks or any other action of the game with the possibility of being bet on).

Artículo 13. Prohibition of betting and gambling.

Employees, directors, managers, administrators and any other person who, due to their relationship with the Club, may have insider knowledge of any aspect of the sporting activity of CÁDIZ CF, may not participate in lotteries, games of chance, sports betting and similar activities related to football or any other sporting discipline of which they have acquired privileged knowledge compared to the rest of the participants.

In this regard, those affected may not:

- Place, personally or through an intermediary, bets on the match involving CÁDIZ CF (directly or indirectly).
- Place bets on a match in a competition in which CADIZ CF participates. This includes competitions in which CADIZ CF is scheduled to play but which have not started, as well as competitions in which the Club has been eliminated.

Article 14. Prohibition of any form of harassment.

Any action defined in this Code as harassment or sexual harassment will be sanctioned by the Club's Disciplinary Regulations and, depending on the development of the investigation, will be notified to the sporting institutions or judicial authority.

CÁDIZ CF is even more diligent in the prevention and detection of this type of action when dealing with minors. The organisation develops the procedures and controls in the Protocol for Prevention and Action against sexual harassment and abuse of minors.

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Article 15.- Prohibition of account, economic and fiscal malpractice.

The Club has zero tolerance for financial malpractice. CÁDIZ CF has developed a Protocol with controls in the management of economic resources and accounting practices. In addition, the Club establishes measures to prevent and detect money laundering in the organisation.

It is the obligation of all employees and suppliers entrusted with economic-financial and accounting responsibilities to properly account for and issue financial reports with maximum transparency. Under no circumstances will falsehood, simulation or deception be accepted.

Artículo 16.- Conflict of interest.

Those subjects defined in article 2, will always have to consult when in the development of their activity and fulfilment of their obligations there is a link or possible interest of:

- Spouse, Domestic Partner and/or person with an analogous relationship of affectivity.
- Close relatives, understood as those with a 2nd degree of kinship.
- Suppliers or sponsors of CÁDIZ CF with whom they have commercial, employment or business ties unrelated to the activity of CÁDIZ CF.

The consultation must be made in writing to the Compliance Officer before the relationship is established.

Artículo 17. Appropriate and rational use of the resources made available to them.

01. The correct use of the resources made available by the organisation is obligatory, using them responsibly and rationally, ensuring that no damage is caused to the interests of the company or to stakeholders.
02. It is strictly forbidden to use the resources for actions that are not related to the original purpose or to use them for personal, extra-professional or other uses than those for which they were made available.

Article 18. Policy on the use of social media.

All employees or representatives of the organisation using social media to discuss issues related to Cádiz CF SAD, its partners or the markets in which it operates must:

- Avoid any defamatory or disrespectful comments/expressions towards the Entity itself or towards the competition, employees and/or representatives, its managers, or those who maintain a commercial or sponsorship relationship with the Entity.
- Ensure that the statements made are true and not misleading.
- Refrain from commenting on any aspect of legal matters or litigation without the prior approval of the Board of Directors.
- Make it clear that the opinion expressed is personal, and does not reflect those of the organisation, unless expressly authorised by Cádiz CF SAD,
- Not to publish anything related to products and/or campaigns that have not yet been publicly presented.

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- Respect internal information and/or confidentiality, maintaining secrecy and avoiding infringement of protected content.

Article 19.- Data Protection and use of IT resources.

The Club will respect the right to **privacy** of its employees, players and collaborators. The request and processing of personal data will be limited to that information that is essential for the normal activity of the Club and for the timely compliance with the applicable regulations.

The Club will adopt the necessary measures to preserve the **confidentiality** of the personal data in its possession and to guarantee that the processing of such data and the exercise of the rights of access, recourse, access and personal data in its possession and to ensure that their processing and the exercise of the rights of access, rectification, cancellation and opposition are carried out in accordance with the legislation in force on this subject, rectification, cancellation and opposition is carried out in accordance with the legislation in force on this matter.

In compliance with the requirements of privacy, data protection and confidential information, the Club has a **Privacy and Confidentiality Policy**.

CÁDIZ CF has a Data Protection Delegate in charge of respecting the rules and integrity of the data, in accordance with the Spanish Data Protection Agency. data integrity, in accordance with the Spanish Data Protection Agency.

THIRD CHAPTER. – VALIDITY AND REVISION

Article 20.- Review and update.

These Regulations shall enter into force on the day following their approval by the Board of Directors.

Artículo 21.- Revision and actualization.

These standards should be periodically verified through updating procedures. Their periodicity shall be in accordance with the needs of CADIZ CF, with special interest if relevant breaches of their provisions arise, or when changes in the organisation, control structure or activity take place that make them necessary.

FOURTH CHAPTER. – COMMITMENT OF ADHESION

In general, adherence to the Code will be done in the following way:

01. In the case of the incorporation of new employees, at the time of signing the employment or commercial contract, with the signing of the commitment to adhere to the Code of Ethics or commercial contract, with the signing of the commitment to adhere to the Code of Ethics.
02. In the development of the business operations or commercial activity of the organisation (suppliers, collaborators, sponsors or any third party that carries out operations with the Club that are affected by the Club's operations, collaborators, sponsors or any third party carrying out operations with the Club that are affected by any of the established affected by any of the established Protocols or Regulations). In these cases, the membership will take place prior to the commencement of the relationship, at the time when the approval of the homologation of suppliers or other requirements of capacity to work with CADIZ CF (conflict of interest, prevention of money laundering, etc).
03. In the case of employees whose employment relationship began before the entry into force of this Code, the Human Resources Department (HR) shall be responsible for the Human

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Resources Department (HR) will be in charge of their delivery and the management of the signing of the commitment to adhere to the Code.