

CODE OF ETHICS FOR THIRD PARTIES







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### 1. Introduction

Sevilla Fútbol Club, SAD (hereinafter the Club or the Company) is a Public Limited Sports Company, affiliated to the Real Federación Española de Fútbol and registered in the Liga Nacional de Fútbol Profesional, which is governed mainly by the Ley del Deporte of 15 October 1990, by the rules that implement it, by the Capital Companies Act and by its Articles of Association and internal regulations.

Proper management of the Club requires the establishment of a series of mechanisms that allow it not only to achieve the objectives that are specific to its main activity, but also to ensure that its conduct fully respects good business practices.

The administration and representation of the Club by its senior management and the work of every one of its employees must respond to ethical values that are inherent to the very nature of society and the principles that inspire it. To this end, the Company expects its Directors and Employees to live up to the values of the Club they represent.

It is necessary to establish a Code of Ethics for third parties which regulates the values and expectations that the Entity expects from them in relation to ethical business conduct.

### 2. Scope of Application

The Code of Ethics for third parties applies to all its customers, suppliers and third parties who support business relationships with Sevilla Fútbol Club SAD, anywhere.

A "Supplier" is a natural or legal person from whom the Club buys or purchases goods or services.

A "Customer" is a natural or legal person who buys or purchases goods or services from the Club.

For the purposes of this Code of Ethics, a Supplier o a Customer would be considered as a Third Party, including those who perform as agents, trading or mediatory.



### 3. Principles and values of the Club

The basic principles that will guide the activity of the Club are:

- > Compliance with legislation in force, especially in business, labour, tax and environmental matters, the Articles of Association and other internal regulations.
- Must be on duty to expand its professional and business activity always respecting universally proclaimed human rights and ensuring their non-violation, by action or omission.
- > Commitment to maintain ethical behavior in their relations with the Club with the aim of avoiding any type of corruption, bribery or extortion.
- > Commitment to maintain internal controls for the prevention of operations related to money laundering or terrorist financing.
- Obligation to comply with labor laws and regulations, respecting all employees rights according to the country's legislation.
- Accurate and transparent accounting records and be able to demonstrate compliance with applicable laws and other regulations
- Commitment not to offer or accept, directly or indirectly, payments, contributions, benefits or gifts in favor of or by public officials, employees of any government entity, political parties as well as international organizations. In this sense, the third party undertakes that if it becomes aware of the breach of this commitment it will immediately inform the Club of all the details related to said information in order to take the appropriate measures.
  - Specifically, a commitment not to offer or accept, directly or indirectly, payments, contributions, benefits or gifts in favor of or by employees or representatives of the entity or any company linked to it and their family members.
- > Commitment to comply with the applicable legislation regarding data protection and applicable privacy, and to carry out data processing within the framework of the contractual relationship with the Club, as well as the confidentiality and security of the information.
- > Obligation to maintain a commitment to the protection and conservation of the environment, respecting the applicable regulations.



### 4. Complaints Channel

Conducts included in this Code of Ethics is mandatory for all Third Parties in the performance of their activity with the Club. They must also be enforced, and non-compliance can and should be reported.

To report any conduct contrary to the Code of Ethics, the Channel https://canaldedenuncias.sevillafc.es/ is made available, assuring the complainant of total confidentiality.

The Compliance Committee shall be the only body with the competence to receive, process and resolve complaints, periodically reporting to the Board of Directors.

### 5. Compliance with the Code of Ethics

Any infringement of the principles of this Code of Ethics could arise in sanctions as well as the termination of the contract signed.

# ESTADIO RAMÓN SÁNCHEZ-PRAN

# **NEVER SURRENDER**



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