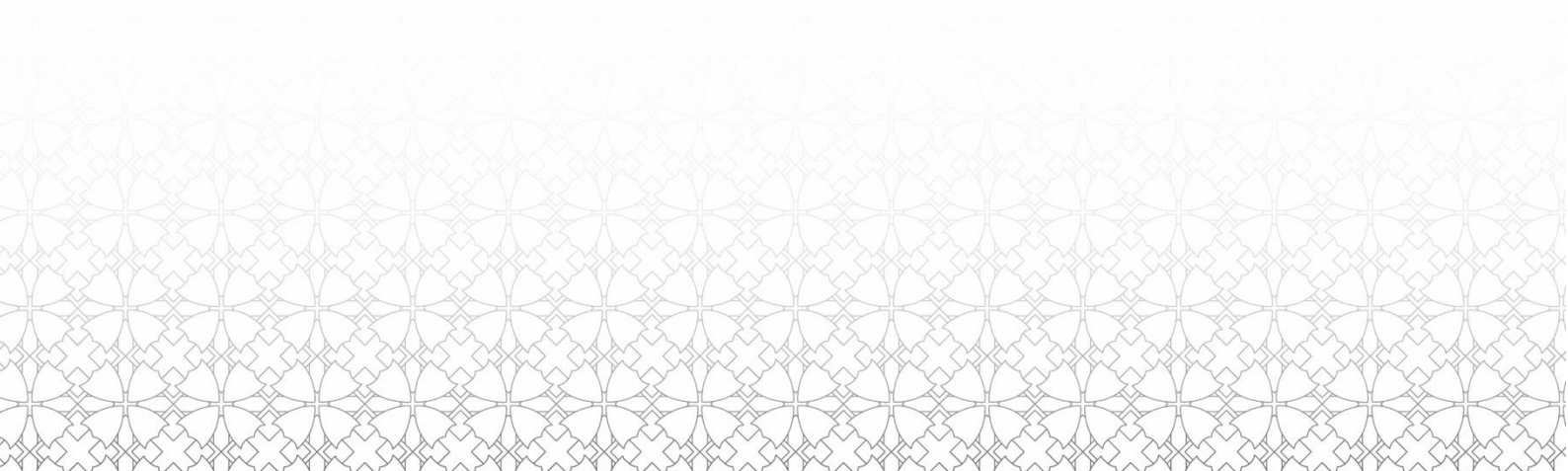




SEVILLA FC

PENAL COMPLIANCE POLICY





INDEX

| | | |
|----|-------------------------------------|---|
| 1. | OBJETIVE..... | 2 |
| 2. | RESPONSIBLE DEPARTAMENT | 3 |
| 3. | PARTICIPANTING DEPARTAMENTS..... | 3 |
| 4. | SCOPE..... | 3 |
| 5. | PURPOSES OF THE ORGANIZATION | 3 |
| 6. | COMMITMENTS..... | 4 |
| 7. | CONSEQUENCES OF NON-COMPLIANCE..... | 6 |



1. Objective

In this respect, The Board of Directors of Sevilla Fútbol Club, S.A.D., hereinafter “the Club” or “the Entity”, in accordance with the provisions of the Penal Code and the UNE 19601:2017 “Penal Compliance Management System”, approves the following Penal Compliance Policy.

The Club develops its activity in the sports sector, and our objective is to develop our activities with compliance with all the normative, legal and regulatory requirements that apply to us due to the characteristics of our services, as well as to be able to ensure this both internally, as well as to our clients, society and other interested parties.

Regarding to, the Board of Directors and the General Management of Sevilla Fútbol Club, S.A.D., will promote the existence in the Entity of a culture of regulatory compliance, based on the highest ethical standards, practicing a policy of zero tolerance regarding penal risks, as well as establishing measures aimed at their prevention, early detection and management, prohibiting the commission of any criminal act.

With this Policy we want to achieve, mainly:

- › Inform Senior Management, Directors and Department Managers, employees, as well as the organizations with which we participate in our operations, that the development of our functions must be based at all times on compliance with applicable laws and regulations, our Code of Ethics and, therefore, our ethical principles and values
- › Define the framework for the development of our Penal Compliance Management System and, for the definition of our objectives, aimed at improving its efficiency.

This Policy applies to the Board of Directors, Senior Management, Area Directors, department heads, employees and business partners and covers all processes and activities carried out in the Club, in accordance with the provisions of the scope, context and interested parties document of the Criminal Compliance management systems.



2. Responsible department

The establishment and implementation of the Penal Compliance Policy corresponds to the administrative body, in this case the Board of Directors.

3. Participating departments

The Club's Management Control department will ensure that this policy is kept updated and the corresponding changes are made to it.

The Management of Sevilla Fútbol Club, as well as the Compliance Body, together with the Human Resources department, must facilitate compliance with these policies, providing the means that are reasonably necessary for their compliance and achievement.

All areas and departments of the Club are affected by this policy, so they must collaborate in its compliance and adjust their conduct to the highest ethical standards and the internal values of the Club.

The aforementioned compliance is not limited to merely carrying out what is required by the rules but also to reporting any conduct or activity that does not comply with them that is carried out within the Entity, requiring that each and every one of us who make up the Club be aware of the importance of compliance with the legislation and regulations, as well as internal rules.

4. Scope

This policy is of general scope and therefore will apply to the entire Club.

Its application, knowledge and compliance will be required from all company personnel (managers and employees), any present or future company that intervenes in the processes and services of the Club and, in general, from all interested parties and staff of business partners with a regular relationship with the organization.

5. Purposes of the Organization

The principles of action on which this Penal Compliance Policy is based are the following:

- › Compliance with the legislation in force, especially in business, labor, tax and environmental matters, the corporate statutes and other internal regulations.



- › Respect, equity and dignity in the treatment of all administrators, employees, non-professional players, collaborators, shareholders, subscribers, clients, suppliers, competitors and other third parties that relate to the Company.
- › Equal treatment between women and men.
- › Protection of minors.
- › Commitment to health and safety at work.
- › Transparency, objectivity and professionalism in the development of all activities and relationships with all interest groups.
- › Integrity in all actions.
- › Privacy, data protection and confidential information.
- › Promotion of sports activity.
- › Fight against violence, racism, xenophobia and intolerance in sport.

All of these principles and values are developed in detail in the Code of Ethics of Sevilla Fútbol Club, S.A.D., available on the Entity's website and intranet.

6. Commitments

For a proper compliance with this Policy, the Club acquires the following commitments:

- › Act in accordance with current regulations, the Ethical Code of Sevilla Fútbol Club S.A.D., the Penal Compliance Management System Manual and internal Policies and Procedures.
- › Be consistent with the principles and values of the Club.
- › Promote a culture of compliance and zero tolerance for the commission of illegal and fraudulent acts.
- › Develop, support and constantly improve the Penal Compliance Management System that allows us to identify, evaluate and manage the risks of non-compliance that may occur in our processes, to minimize the Club's exposure to them. For it, the Entity has prepared a Risk Map that provides a global vision of the potential risks that could materialize within the organization in order to identify them and prevent their commission.
- › Constantly demand and supervise compliance with all penal legislation that applies to our operations.



- › Ensure continuous improvement of the Penal Compliance Management System. All the information obtained and managed in the monitoring and evaluation process will be used to detect opportunities for improvement and adopt actions aimed at optimizing the Club's Penal Compliance Management System on a continuous basis.
- › Define and review the achievement of penal compliance objectives.
- › Grant the necessary authority and independence to the Compliance Body as an autonomous body to supervise the degree of effectiveness and compliance of the Penal Compliance Management System.
- › Promote compliance with point 4 of the Club's Code of Ethics for Third Parties among business partners and interested parties, by presenting communications of acts of non-compliance with the legal, internal and external regulations of the organization or, where appropriate, raising doubts about compliance and/or non-compliance that they consider.
- › It will be guaranteed at all times that the informant - people who, in a work or professional context, detect and report on regulatory infractions and the fight against corruption - is not subject to retaliation and their confidentiality will be protected, for which our Internal Web Information Channel is made available to them, which ensures their independence, confidentiality and absence of retaliation.
- › Support the application of the applicable disciplinary regime in accordance with the provisions of the Workers' Statute, the Sectoral Collective Agreement and the Penal Code, as well as any other applicable regulations that sanction conduct contrary to the applicable laws and regulations, and the requirements of this Policy and our Penal Compliance Management System.

The Board of Directors is committed to compliance with this Penal Compliance Policy, as well as the requirements included in the Management System that develops them, and as evidence of this, proceeds to approve this document.



7. Consequences of Non-Compliance

Non-compliance with this Policy, the Code of Ethics, the Manual of the Penal Compliance Management System or any other Policy or Procedure that is part of the Penal Compliance Management System of Sevilla Fútbol Club, which are detected during the monitoring and evaluation process, or by communications submitted through the Internal Information Channel, or by any other means, will be communicated to the Compliance Body as responsible for the management of those non-compliances of which it is aware.

Failure to comply with this Policy and the related internal regulations may give rise to labor sanctions, without prejudice to the administrative or penal sanctions that, where appropriate, may also result from this.

The following behaviors may be sanctioned in accordance with current labor regulations:

- › Failure to report a breach of the Code of Ethics when you become aware of it.
- › Making false communications, with the purpose of harming a third party.
- › Carry out any discriminatory or harassing behavior against a person who has made a communication/information.
- › Failure to comply with the provisions of this policy.

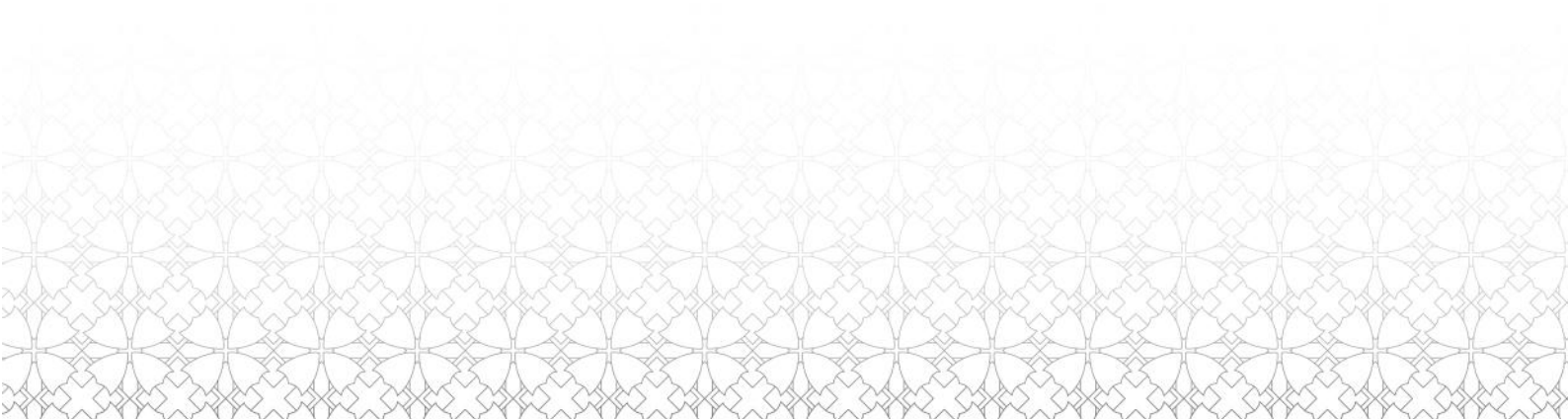
The Disciplinary Regime is configured by the applicable current labor legislation and, especially, by the applicable sectoral collective agreement and the Workers' Statute.

On the other hand, the consequences applicable to business partners subject to this policy (customers and suppliers) could be:

- › Termination of the contractual relationship.
- › Responsibilities regulated in the applicable regulations (civil, criminal, commercial, etc.).

Finally, depending on the seriousness of the facts, they may be brought to the attention of the authorities.

NEVER SURRENDER



ESTADIO RAMÓN SÁNCHEZ-PIZJUÁN

SEVILLA FUTBOL CLUB





NEVER SURRENDER