



SevillaFútbolClub,SAD

CODE OF ETHICS

Version 1.3

The update of this document has been approved by the Board of Directors of Sevilla Fútbol Club S.A.D., dated november 2020.

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I. DEFINITIONS

Directors or the Board of Directors: persons who hold the function of management and representation of the Club, appointed by the general meeting of shareholders.

Customer: natural or legal person who buys or purchases goods or services from the Club.

Associates: people who cooperate with the Club without having an employment or commercial relationship or holding the status of Director.

Conflict of Interest: situation in which the interests of the Club and the personal interests of any liable party, or the interests of any person connected with it, come directly or indirectly into conflict.

Employees: individuals who have an employment relationship with the Club, whether regular or special, temporary or indefinite.

Supplier: natural or legal person from whom the Club buys or purchases goods or services.

Company or Club: Sevilla Fútbol Club, S.A.D.

II. 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 each and 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.

The Club expects exemplary behaviour from all its Directors and Employees, as well as from its Associates. In addition to complying with the regulations, Directors and Employees must refrain from behaving in a way that, although not beyond legal reproach, may be reprehensible from an ethical point of view.

Therefore, it is necessary to establish a Code of Ethics which regulates the values that should inspire actions of governance, representation and work - from a positive point of view - and establishes which behaviours are contrary to those values - from a negative point of view.

The conduct set out in the Code is compulsory for all Directors and Employees in the performance of their activity in the Club and must also be enforced, and any non-compliance may and must be reported.

Any doubts about the application of this Code can be consulted with the Compliance Committee.

In order to report any conduct contrary to the Code of Ethics, the following page <https://canaldedenuncias.sevillafc.es> will be made available, to persons included not only in the scope of application of this Code of Ethics but also to third parties not included in it, ensuring the complainant full confidentiality.

Retaliation of any kind against individuals who report an illegal practice, infringement, or breach of regulations will not be tolerated.

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

III. SCOPE OF APPLICATION

The Code of Ethics applies to the Company and is binding for Directors and Employees.

The Code has been approved by the Board of Directors, which is responsible for its application and periodic updating. To this end, it will appoint a Committee that will operate as a Compliance Committee.

The Compliance Committee shall be composed of four members - three non-executive directors and the secretary of the Board of Directors, and shall draw up its internal operating rules for ratification by the Board of Directors.

IV. PRINCIPLES AND VALUES OF THE CLUB

All Directors and Employees must know and meet the expectations of the Club regarding how to act in the working and business environment.

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.
- Respect, fairness and dignity in the treatment of all Directors, Employees, non-professional players, Associates, shareholders, season ticket holders, Customers, Suppliers, competitors and other third parties related to the Company.
- Gender Equality .
- Protection of minors
- Commitment to health and safety at work.
- Transparency, objectivity and professionalism in the development of all activities and relations with all stakeholders.
- Integrity in all actions.
- Privacy, data protection and confidential information.
- Promotion of sporting activity.

These principles must be known and respected by all Directors and Employees, assimilating them and reflecting them in all their actions.

V. DEVELOPMENT OF THE PRINCIPLES

i. Compliance with legislation in force, especially in business, labour, tax and environmental matters, the Articles of Association and other internal regulations.

The Law, the Articles of Association as well as other internal regulations imposed by the Club must be complied with. No illegal practices or non-compliance with the regulations will be tolerated within the Club. In addition, Directors and Employees must inform the Compliance Committee whenever they detect any non-compliance.

The procedures and policies that are in force at any given time must be followed and, in the event of identifying needs for change or improvement, these may be proposed following the channels established at any given time.

ii. Respect, fairness and dignity in the treatment of all Directors, Employees, non-professional players, Associates, shareholders, season ticket holders, Customers, Suppliers, competitors and other third parties related to the Company.

Directors and Employees are committed to creating a dignified, safe and professional working environment that supports and respects people, their rights, their dignity, their personal conditions, and that promotes mutual respect and collaboration.

Offensive, intimidating, discriminatory, malicious, humiliating or disrespectful behaviour or harassment towards Directors, Employees or third parties related to the Club is not allowed and must be reported if necessary.

The Directors and Employees shall exercise their utmost diligence when performing actions of a public nature that could harm the image and prestige of the club.

iii. Gender Equality.

The Club shall promote effective equality of treatment and opportunity between women and men, and to this end it shall adopt and enforce measures with its Directors and Employees aimed at avoiding any discrimination on the basis of sex, particularly regarding employment.

The Directors and Employees undertake to avoid the use of sexist language and making comments on particular skills and situations based on sex, and therefore contributing to the creation of favourable environments for mutual understanding and respect between colleagues of different sex, which is especially necessary in relation to sensitive protective circumstances such as maternity and family reconciliation.

iv. Protection of minors

With regard to the relationship with players in the lower categories, particularly with those who are minors, men or women, amateurs or professionals, the Employees and Directors will pay special attention to complying with the regulations for the protection of minors in the processes of admission, training and development.

While aware of the importance of protecting this particularly vulnerable group, the Club, the Directors, Employees and Associates will take the utmost care to avoid any type of conduct that could be qualified as abuse or harassment, whether or not of a sexual nature, paying special attention and vigilance to minors, with constant supervision and support.

In compliance with Organic Law 1/1996 on the Legal Protection of Minors, modified by Law 26/2015, of 28 July, on the modification of the system for the protection of children and adolescents, we require all professionals and volunteers of the Club who are in regular contact with minors to provide negative certificates from the Central Registry of Sexual Offenders.

v. Commitment to health and safety.

The Club will establish any action plans as are necessary to properly manage and mitigate the risks associated with its activity. These plans will be reviewed periodically, and the necessary resources will be provided for their maintenance and improvement.

The prevention of accidents and the promotion of safety in the performance of our activity will go hand in hand with the activity of the Club.

Directors, Employees and Associates will be trained to adequately carry out their tasks, prioritising safety in all areas. They will be provided with the necessary resources to guarantee this safety.

The Club has an Occupational Risk Prevention Plan in compliance with its commitment to health and safety at work.

vi. Transparency, objectivity and professionalism in the development of all activities and relations with all stakeholders.

The Club as an entity and its Directors and Employees will base their relationships with each other and relationships with third parties on ethics, professionalism and transparency:

- All individuals and entities will be treated without discrimination and with impartiality, and it is not permitted to provide privileged information or give preferential treatment to any of them.
- Legitimate and honest competition will be promoted, avoiding unjustified harm to competitors, whether individuals or entities.
- Relations with suppliers and sponsors, or with any type of supplier or contractor, shall be guided by impartiality and objectivity, applying rigorous criteria of suitability, quality, efficiency and cost.
- No Director or Employee may accept gifts, invitations, handouts, services or favours that could affect his or her professionalism, objectivity and/or impartiality in his or her professional dealings, that involve a commitment to return a favour within the Club and its environment, and/or that involve fraud, illegality, unethical practices or harm to third parties.
- Likewise, no gifts, invitations, handouts, services or favours will be offered to persons or institutions that could affect their objectivity and/or impartiality in their commercial or professional relations, that could generate a commitment to return a favour, in respect of the Company and its environment, and/or that could involve fraud, illegality, unethical practices or detriment to third parties.
- It is expressly prohibited to engage in conduct that may constitute a predetermination of sporting results, including doping as a means of adulterating sporting performance and harming the health of athletes.

Predetermination of results involves promising, offering or granting benefits or advantages of any nature, which are not justified, in order to pre-determine or deliberately and fraudulently alter the result of a match. Similarly and conversely, it is totally prohibited to receive, request or accept such benefits or advantages.

- The Club as an entity, and all its Directors and Employees, will adequately and diligently collaborate with the authorities, the justice system, the public regulatory entities and other public entities, without putting obstacles, hindering or generating errors or omissions, facilitating their work in all dealings with them and bringing to their attention all appropriate and/or obligatory information.

- All Directors and Employees will carry out their work with quality, diligence, professionalism, transparency and honesty, trying to contribute value, improving efficiency, informing of any risks, deficiencies and/or improvements, innovating, making a rational and adequate use of all the resources and safeguarding the assets of the Company.
- In order to avoid conflicts of interest, the Directors and Employees will not have any economic or other type of interest, nor will they carry out any paid activities for companies or institutions related to the Club. Should such a circumstance arise, it must be reported to the Compliance Committee so that the necessary measures can be taken, if necessary, and in any case, they must abstain from the decision-making process in cases where there is a potential Conflict of Interest.
- Individuals holding a position in the Club are not allowed to use their resources, powers, influence or other facilities of the Club, for their particular benefit or for persons closely related to them. It is also strictly forbidden for an individual or entity to act in the name of or on behalf of the Club without prior consent, or to use the Club's name, means, relations with third parties, position or influence for their own benefit or for persons closely related to them.
- It is prohibited to act, without having been duly authorized to do so, in areas of management or representation other than those assigned to them, or in decisions whose competence corresponds to a higher position or body.
- It is prohibited to hire relatives up to the fourth degree or related by marriage or other form of partnership, either personally or through companies in which they participate or work, without the express written authorization of the Board of Directors, in the case of relatives of Directors and executives, and of the Personnel and Remuneration Committee, for relatives of other Club employees.
- It is not permitted to enter into contracts for external goods and services that are unnecessary, irrelevant or untimely, and in breach of the provisions of the purchasing policies, nor is it permitted to receive or pay commissions or unjustified advantages of any kind as consideration for inappropriately favouring another in the acquisition or sale of goods, or in the contracting of services or in other commercial dealings, or which exceed or are beyond those corresponding to authorised professionals or exceed the market value of comparable transactions.

The Club has, among others, an **Anti-Corruption Policy, a Conflicts of Interest Policy and a Gifts and Services Policy**, which must be complied with by all Directors and Employees.

vii. Integrity in all actions.

All actions of Directors and Employees shall be governed by conduct based on good faith and honesty.

In the sporting environment, fair play is the basis for confidence in the game and any form of alteration of the normal course of a sporting competition can constitute fraud.

viii. Privacy, data protection and confidential information.

The Club will respect the right to privacy of its Directors and Employees. The request and processing of personal data will be limited to that information which is essential for normal Club activity and for specific compliance with applicable regulations.

The Club will take the necessary measures to preserve the confidentiality of personal data at its disposal, to ensure that its processing and the exercise of the rights of access, rectification, cancellation and opposition are exercised in accordance with legislation in force on this matter.

Directors or Employees who, through the performance of their professional work, have access to information on other Directors or Employees must respect and promote the confidentiality of this information and use it responsibly and ethically.

The activity of the Club can give rise to knowledge and information of a commercial or sporting nature whose value mainly lies in keeping it confidential. The Directors and Employees will make discreet and professional use of the information to which they have access and will observe absolute confidentiality about the content of their work.

In any case, all parties will refrain from using information, data or documents obtained in the course of their activity for their own benefit or that of third parties, and will always use it exclusively for the benefit of the Club.

In compliance with the requirement of Privacy, data protection and confidential information, the Club has a **Privacy and Confidentiality Policy and an Information Security Policy**, compulsory for all Directors and Employees.

ix. Promotion of sporting activity.

The main objective of the Club is to participate in sports competitions in a context of economic sustainability, acting with practices and conduct that dignify its image and the values it represents.

The Directors and Employees shall give priority to the following principles:

- Loyalty and service to the Club: any action by a Director or Employee in the exercise of their duties must be intended solely and exclusively for the interests of the Club.
- Participation and communication: an attitude of providing information will be promoted, based on the transparency of all decisions and actions. The participation of shareholders and season ticket holders will be encouraged according to the nature of each issue.
- Pluralism: pluralism will be preserved and respected, ensuring that the Club's policies and actions are not exclusionary.
- Honesty and integrity: the individuals who form part of the Club must strive to preserve and improve the Club's heritage. Integrity shall at all times take priority in the management of the Club and shall apply to all of its social and economic activities.

VI. ORGANISATIONAL MODEL FOR THE PREVENTION OF CRIME

Since Organic Law 1/2015 of 30 March came into force on the reform of the Criminal Code, the Club has implemented an organisation and management model that includes surveillance and control measures for crime prevention or to significantly reduce the risk of offences being committed within the Club, by:

- Its **Directors** or by anyone who, acting individually or as a member of any of the Company institutions, are **authorised to take decisions on behalf of the company**, when acting in the company's name or on its behalf and for its direct or indirect benefit,
- The **Employees** acting on company business and for the direct or indirect benefit of the Club; if, while subject to the authority of the de facto or de jure directors or legal representatives, **a serious breach of the duty of control** has occurred, the specific circumstances of the case will be taken into account.

As a result of the model, the Club has developed a Criminal Risk Prevention Manual. All Directors and Employees must agree to comply with the requirements of the manual.

To this end, training will be provided to all recipients of the manual and the ethical principles and policies established by the Club to minimise criminal risks.

VII. TRAINING

Sevilla Fútbol Club is committed to the ongoing training of its Directors and Employees, ensuring access to training programmes for all of them depending on their professional category and the nature of the work they perform.

VIII. INFRINGEMENTS

Any infringement of this code of ethics will be penalised at the proposal of the Compliance Committee in accordance with the applicable disciplinary code, whether the Collective Agreement for the sector or of the Company or any other applicable regime and in accordance with the internal rules of the Club for work-related and non-work-related groups.

ACKNOWLEDGMENT OF RECEIPT

Version 1.3

I, the undersigned _____ (Name and surname(s) in capital letters). with ID number _____

I hereby declare that:

- I have received a copy of the Code of Ethics and I have read and understood it.
- I am aware that the latest version of the Code can be accessed through our Intranet, Synergy.
- I undertake to respect and comply with all the provisions of the Code of Ethics as well as the policies implemented in the Crime Prevention Plan.
- I promise to communicate any action contrary to the Code of Ethics of which I become aware through the channel <https://canaldedenuncias.sevillafc.es>
- I am aware that failure to comply with the Code of Ethics may result in disciplinary action being taken against me.

On _____ the ____ of _____, 202_

Signed:

In compliance with current regulations regarding the Protection of Personal Data, you are informed and by signing this document, you give your consent for the data you provide to be processed by Sevilla Fútbol Club S.A.D., in order to process the acknowledgement of receipt of this Code of Ethics. The basis that legitimates the processing of personal data is the execution of the contractual relationship. The data provided will be processed while this working relationship is in place and thereafter until the contrary is communicated, and at least as long as it is necessary to comply with legal obligations.

You may exercise your rights of access, rectification, cancellation, objection, limitation of processing, data portability and not to be subject to automated individualized decisions (including the creation of profiles), by sending a signed request with the subject "Data Protection" to the following address: C/ Sevilla Fútbol Club s/n Estadio Ramón Sánchez Pizjuán 41005 Sevilla, clearly indicating your contact details and sending a copy of your identity card or by email to lpd@sevillafc.es, from the same account you provided. We inform you that the Data Protection Delegate is: Grupo Datcon Sur S.L.U. C/ Dr. Duarte Acosta 7, 1.24, 11500, El Puerto de Santa María, Cádiz and that you can exercise your right to file a complaint with the Spanish Data Protection Agency (www.aepd.es).