



CODE OF ETHICS

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1. CORPORATE PRINCIPLES AND VALUES

The objective of this Code of Ethics is to collect the ethical and action principles with which the company Arnoia Distribución de Libros S.A. is committed. (hereinafter "Arnoia"), and which also affects its employees and managers in the development of their professional performance.

Arnoia understands that ethical business behavior is an essential requirement to guarantee and safeguard the balance between the rights of the interested parties and society in general, being essential to fulfill the objectives of Arnoia. Ethical behavior requires compliance with the applicable legal rules and regulations at all times, as well as the internal rules and codes of conduct and good practices that Arnoia voluntarily adopts.

This commitment is summarized in the following principles:

- Integrity and responsibility.
- Warranty and customer service.
- Respect for human rights.
- Gender equality.
- Relationship and connection with society and the environment.
- Respect for the environment and commitment to sustainable development.

2. ETHICAL AND RESPONSIBLE ACTION

The business principles and values described above constitute the reference that should inspire the conduct of Arnoia employees and managers, as well as any natural or legal person that represents them. An ethical and responsible action must consider the following aspects:

- Carry out commercial operations, as well as any other activity, honestly, with integrity, professional and transparent.
- Comply with and enforce the laws and regulations applicable at any time and place, as well as the internal behavior standards and any others that are voluntarily adopted.
- Maintain due diligence for the prevention, detection and eradication of any irregular conduct.

2.1 Employees and Directors

Arnoia's principle and commitment is to treat with dignity, respect, equality and justice all the people who carry out their activity in the company environment and in its sphere of influence. That is why in its internal policy it designs labor relations and work systems so that they guarantee non-discrimination for any cause, avoiding all situations that could give rise to possible discriminatory acts.

Arnoia guarantees that:

- Working conditions are safe and healthy for all employees.
- The work environment is free from all forms of violence, harassment or abuse at work through prevention, detection and resolution procedures.
- No forced labor of any kind is allowed and no child labor is used. Therefore, Arnoia requires from its employees and managers:

1. Protect and improve the good image and corporate reputation of Arnoia, exercising its functions in a professional, ethical and responsible manner.
2. Comply with and enforce the laws in force at all times, as well as this Code of Ethics and any other rules of conduct and behavior that Arnoia assumes as its own.
3. Treat their colleagues with dignity, respect, equality and justice, without allowing any discrimination.
4. Promote a work environment free from all forms of violence, harassment or abuse.
5. Inform through the established channels of those situations potentially contrary to the principles and values of Arnoia.
6. Make good use of the material and technical means that are made available to you.
7. Attend to the defense of Arnoia's interests in the performance of all its work activities.
8. Respect, protect and help protect one's own and others' industrial and intellectual property.
9. Exercise their activity in mental conditions not affected by the consumption of substances that impede good professional performance.
10. Maintain the high standards of integrity of the company.
11. Focus all your efforts on fulfilling the mission of the company.
12. To promote a stimulating, safe and respectful work environment, in which all its members can contribute their knowledge, skills and experience.

2.2 Clients

Arnoia establishes as a fundamental pillar of its commercial policy to achieve the maximum

customer satisfaction and offer the highest level of service, attention, quality, capillarity and guarantee by offering products and services that optimize their purchase decision, according to their needs and interests. Arnoia values the trust you have placed in the company and welcomes your suggestions and comments.

Consequently, employees and managers will always act with responsibility, commitment and the utmost respect, having as a priority to achieve excellence in customer service, as well as in the quality and safety of their products and services offered. In addition, your employees and managers will always communicate professionally, honestly, openly and reliably, and within appropriate time frames.

2.3 Suppliers and Business Partners

Relations with suppliers will be developed in a transparent collaboration framework that allows and facilitates the achievement of mutual objectives, always within compliance with current legislation. Arnoia encourages all its business partners, suppliers and operators to assume and comply with the ethical principles and responsible action set forth in this Code.

In order to establish mutually beneficial relationships with its suppliers and business partners, Arnoia, its employees and managers are committed to:

1. Maintain maximum collaboration and loyalty, respecting and ensuring that the agreed agreements are respected.

2. Collaborate exclusively with suppliers and business partners who respect human dignity and human rights, comply with the laws and accept Arnoia's code of ethics and behavior, preventing their reputation from being compromised.
3. Use quality criteria to select the products and services we offer, as well as the working and distribution conditions.
4. Develop the relationship between Arnoia employees, their suppliers and their external collaborators in a framework of trust and mutual collaboration in favor of transparency, efficiency, quality and cost, avoiding any favorable treatment for personal reasons.

2.4 Relations with Public Administrations and Regulatory Bodies

Arnoia employees and managers will interact with public authorities and institutions in a lawful and respectful manner under the principles of cooperation and transparency.

No employee or manager of Arnoia will make payments to facilitate or expedite procedures considered of doubtful morality, in cash or any other object of value, before any judicial body, public administration or official body.

2.5 Institutions and Public and Private Organizations

Arnoia participates in organizations and/or institutions related to its activities, collaborating in the search for solutions that seek the common good of society in general. It respects all institutions and their representatives, maintaining the principle of political neutrality. Collaborate with Public Administrations and with entities and

non-governmental organizations dedicated to improving the levels of social care for disadvantaged people and in situations of need.

2.6 Social networks

Arnoia establishes a series of recommendations for the use of social networks by its managers and employees, as well as other associated organizations, in order to guarantee the safety of each of them and of the company itself.

The use of social networks must be consistent with the rest of this code, so the following recommendations are based on three fundamental pillars:

2.6.1 Confidentiality

First of all, the laws and established rights must be respected, with emphasis on those related to intellectual property and the protection of personal data.

In relation to Arnoia, it is prohibited to disclose confidential information, and all publications that may reveal information about the internal functioning of the company must be approved by the company's communication managers. Similarly, publications on behalf of the company may only be carried out by members of this department, other managers or persons authorized by any of these groups.

Publications on social networks of confidential or unauthorized information about the internal functioning of the company or of organizations linked to it that may damage its reputation and public image will be subject to legal proceedings against its issuer.

2.6.2 Respect

Arnoia advocates respect for people, so the company recommends avoiding content related to politics, religion, ethics or aspects of similar sensitivity that could be misinterpreted or the object of controversy. It also recommends that all publications contain truthful and verified information.

2.6.3 Transparency and honesty

Arnoia recommends always participating in the first person and always establishing that you speak on your own behalf to your employees and managers.

To do this, it is essential to properly identify yourself with a real name and, if necessary, provide your position when discussing issues related to the sector. The use of pseudonyms or false names is strongly discouraged.



3. CORPORATE SOCIAL RESPONSIBILITY AND ENVIRONMENT

Arnoia recognizes Corporate Social Responsibility as part of its management strategy, a factor of competitiveness and a fundamental element of the policy of linking with society that it has maintained since its inception. In addition, it assumes its commitment as a socially responsible entity, seeking a constant and fluid relationship with all its stakeholders. Arnoia is committed to the continuous improvement of its management, developing a sustainable business both in the social and environmental fields. Therefore, employees and managers must:

- Know and apply the social responsibility and sustainability policies that emanate from the Arnoia Management.
- Develop their work activity trying to minimize the environmental impacts that could be generated. For this, they will collaborate in the processes of waste reduction, as well as in the minimization of energy consumption and consumption of fuels, water and materials.



4. INNOVATION

Our constant search for innovation is aimed at satisfying the changing needs of our customers at all times, taking into account their concerns and expectations. Employees and managers must contribute positively to the innovation and improvement processes that are developed in their respective areas.

Since the beginning of its activity, Arnoia has carried out the implementation of various tools in order to stay at the forefront of new technologies and to achieve maximum efficiency in the management of processes and tasks in order to reduce time and costs.

Arnoia has automation systems for managing the reception and dispatch of material in its warehouses in order to facilitate the work of all operators in this section and avoid inventory errors. All employees in this section go through a training process in them and are equipped with instruments to carry out their tasks.

Tools have also been implemented on the company intranet for the use of employees, aimed at communicating with each other and with suppliers, managing tasks and common spaces, managing customer service incidents and many other functions.

5. INTEGRITY, BUSINESS KNOWLEDGE AND FAIR COMPETITION

Integrity: Arnoia does not accept or offer, either directly or indirectly, any type of advantages of a dubious nature in order to obtain an economic or commercial benefit. No employee or manager will accept or offer any type of award, gift, hospitality or favorable treatment for these purposes. Any request or offer of this type must be communicated to the Management. As an exception, the Management may consider gifts or gifts offered as prizes for the work and work carried out, although they must be expressly approved.

Transparency: Financial information, accounting, contracts and auxiliary documentation faithfully record the nature of the transactions that Arnoia carries out, in such a way that the annual accounts reflect the reality of commercial operations. Consequently, employees and managers undertake that the information, in the preparation of which they participate, is complete, truthful and reliable.

Fair Competition: Arnoia believes in competition exercised honestly, fairly and loyally, and therefore does not admit in any case deceptive, fraudulent or malicious conduct. Therefore, it undertakes to carry out operations in its companies, through its employees and managers, according to the principles of healthy competition and in accordance with all applicable rules and regulations. On this basis, employees and managers:

- Will not engage in abusive or unfair business practices.
- Will prevent the interest of the customers of other competitors from being aroused by inappropriate, unfair or illegal methods.

6. CONFIDENTIALITY COMMITMENT AND DUTY OF SECRECY

Arnoia, its directors and employees undertake to maintain strict confidentiality and secrecy in relation to the information available to them and to which they have access, be it financial, commercial and / or technological. Likewise, they commit to maintain confidentiality and to protect the personal data that deals with employees and managers, clients, suppliers and all those from whom special protection is legally required.

Likewise, managers and employees commit to:

- Put the utmost zeal to differentiate and not generate confusion between the expression of their opinions and personal criteria, with the transmission and dissemination of criteria, guidelines, instructions and/or norms of the Arnoia company, which they communicate by and as a consequence of the responsibility that they hold based on the activity they carry out as directors and employees of Arnoia.
- Refrain from offering in the media, social networks, opinion forums and any other support of information, opinions, data, action criteria, uses and/or internal procedures that correspond to those of Arnoia, or imply that they come from them, their administrators, executives, area managers and/or employees, unless expressly and in writing they have been entrusted with the transmission of said information by a person authorized to do so.

A photograph of an office workspace. In the foreground, a white desk holds two black computer monitors. A blue office chair is positioned in front of the desk. On the desk, there are also some papers, a pen holder with pens, and a small container. Behind the desk, a large window provides a view of a green landscape with trees and hills under a clear sky. The ceiling is white with a grid pattern and a skylight. The floor is made of light-colored wood.

7. CONFLICT OF INTEREST

The directors and employees of Arnoia will not develop behaviors or activities that could give rise to a personal benefit (direct or indirect) or to any collision or conflict of interests (personal, family, other related parties, another employee, supplier or collaborating company), with those of Arnoia, having to report it to the company.



8. APPLICATION, ACCEPTANCE AND DISCLOSURE

This Code of Ethics is applicable to all Arnoia staff and managers, and is applicable to any natural and/or legal person directly or indirectly related to Arnoia, when it is convenient for the fulfillment of its purpose and is possible due to the nature of the relationship. Arnoia employees and managers must expressly accept and ratify the principles of action established in this Code.

In order for all the people who make up Arnoia, as well as its interested parties, know the content of the Code of Ethics, it will be made known through the relevant internal communication systems and dissemination channels.

9. CHIEF COMPLIANCE OFFICER

The Chief Compliance Officer has among his obligations:

- Promote the dissemination, knowledge and compliance with the Code of Ethics.
- Develop the actions related to it.
- Solve any doubts that may arise about its interpretation.
- Prepare an annual report on the incidents that have been communicated and on the opinions issued in relation to compliance with the Code of Ethics.

The intervention of the Chief Compliance Officer in the event of possible breaches of the Code may be both on its own initiative and at the request of a party. In these cases, the Chief Compliance Officer:

- Will examine, investigate and rule on known irregularities.
- Will guarantee the confidentiality of all known data and antecedents, as well as the actions carried out. Confidentiality will be maintained over time, unless it has to be lifted by requirements established by law or express judicial requirement.

10. NON-FULFILMENT OF THE CODE OF ETHICS

Failure to comply with the provisions of this Code, as well as any other internal Arnoia regulations, may imply the application of the appropriate sanctioning measures; all in accordance with the provisions of the Workers' Statute, the applicable Collective Agreements, and other applicable labor regulations.



A close-up photograph of a person's hands in a business suit, holding a white stylus and writing on a tablet. The background is blurred, showing more of the person's torso and arms.

11. REPORTING OBLIGATION AND ETHICAL CHANNEL

Arnoia employees and managers have the obligation to report any irregularity in relation to compliance with this code, as well as any circumstance in which a third party could induce themselves or another Arnoia employee / manager to contravene this Code of Ethics. For this function, the company establishes an Ethical Channel available to all internally managed employees.

The Ethical Channel is a confidential and transparent form of communication so that both the members of the company, as well as other interested parties, have an adequate channel to report those behaviors that may lead to an irregularity, or any contrary act the legality or the rules of behavior of the Code of Ethics and other applicable internal rules; are committed by other members of the company or by representatives or employees of companies that collaborate with Arnoia in its different activities.

Its purpose is to establish the necessary mechanisms to communicate and manage early any matter related to the scope, compliance and interpretation of the regulations applicable to Arnoia; as well as, especially, those behaviors from which a crime could be derived.

The extent of this procedure covers all inquiries and complaints that may be raised by any member of the company, business partner or third party.

The management of the Ethical Channel corresponds to the Chief Compliance Officer, who assumes the task of receiving, verifying and processing the communications received by the means authorized to do so.

Throughout the verification process, the fundamental rights to privacy, defense and the presumption of innocence of the people involved in it will be guaranteed.

The channel will be regulated by the following principles:

- The Members of the Organization, as well as other interested parties thereof, who have rational and reasonable indications of the commission of an irregularity or of any act contrary to the law, or to the rules of behavior of the Code of Ethics and other applicable internal rules that the Organization voluntarily adopts, must notify the Chief Compliance Officer through the Ethical Channel. In the case of people who have a working relationship with the Organization, commercial relationship or development of a service, this communication will be considered an essential part of good faith in contractual compliance.
- The identity of the person who reports a breach through the Ethical Channel will be treated as confidential information. For this reason, it will not be revealed to those who may be immersed in a verification process.
- The data of the people who carry out the communication may only be disclosed to the administrative or judicial authorities, insofar as they require it as a consequence of the procedure derived from the object of the communication, as well as to the people involved in any subsequent investigation or judicial procedure initiated by and as a consequence thereof. The transfer of the data will be done in accordance with the provisions of the legislation on protection of personal data.

Arnoia requests this collaboration for the benefit of a better functioning of its services, for which it appreciates and encourages its use. Only in the event that, as a result of the investigation, it is found that the complaint has been filed in bad faith, it will be communicated- if there is a working relationship with the complainant- to the Human Resources Department for the adoption of the appropriate measures.

- A complaint in bad faith will be understood as one that is not based on facts or indications from which an anomalous event or irregular behavior can reasonably be inferred; the one formulated even when the author is aware of the falsity of the facts and/or voluntarily misrepresents them; the one formulated with the intention of revenge, harassment or defamation, or one that only seeks personal or professional damage towards the affected person or the Organization.
- The report in good faith, whether made by people outside or related to the Organization, may not give rise to any negative consequence, being a conduct that the Organization promotes and appreciates, for the benefit of the better performance of its business activity. If the complainant in good faith suffers any type of detrimental decision, he will inform the Chief Compliance officer, who will promote its immediate cancellation, giving an account of it in his Report to the Administration Bodies.

The processing of the communications presented through the Ethical Channel corresponds to the Chief Compliance Officer, who, under his responsibility, may delegate his instruction to qualified persons, by means of a specific appointment for it.

This management includes:

- Receipt of the communication.
- Initial examination of its content.
- Assignment of a reference, information to the sender and information to the accused or third parties affected by the communication.
- Instruction or verification of the facts.
- Resolution and action proposal.
- Basic registration and preparation of operating reports.

The delegation for the processing of communications may be carried out by the Chief Compliance Officer in one or more people, depending on their nature and difficulty. In case that person is not available, another member of the Compliance Committee may carry out this task.

Arnoia facilitates and manages the following communication channels to its employees and managers, as well as to third parties in general, in relation to compliance with the Code of Ethics:

Email: canaletico@arnoia.gal

Address: Arnoia Distribución de Libros, S.A.
Polígono Industrial A Reigosa, Parcela 19,
36827 Ponte Caldelas, PO



A photograph of a modern, multi-story office building with a light grey facade and a series of windows. The building is situated in front of a hill covered in dense green trees. The Arnoia logo, featuring a stylized 'A' and the word 'rnoia' in blue, is visible on the building's facade.

 rnoia

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