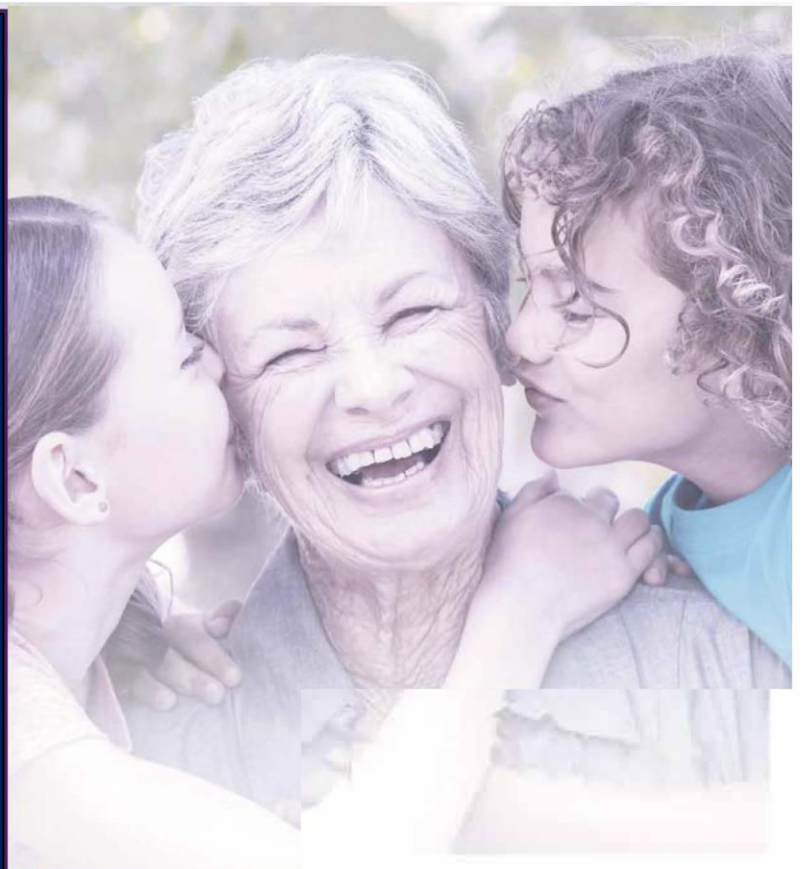




CODE OF
ETHICS



PENSIUM

MISSION

PENSIUM's mission is to facilitate financing for home care and residential care services for elderly homeowners

GUIDING PRINCIPLES

For the development of its activities, as well as throughout each of the information, pre-contractual, contractual, monitoring and termination phases, PENSIUM is committed to adhering to the following principles:

Transparency: clients and authorised users may access all the information necessary to understand how PENSIUM operates, including its costs, risks, possibilities, evolution, revocation and termination. PENSIUM complies with the information disclosure standards applicable to equivalent financial transactions. All documentation related to the transaction shall be privately accessible with the corresponding security measures.

Simplicity: PENSIUM's procedures and its contracting, information and related documentation have been designed following the principle of maximum simplicity and effective communication.

Agility: PENSIUM is committed to prompt action and responsiveness. Response times shall comply with those indicated in the different sections of the website, according to each service.

Responsibility: PENSIUM carries out its activity of granting supplementary income to elderly people with real estate assets in accordance with the principles of maximum responsibility, reasonableness and customer understanding.



CODE OF ETHICS

PENSIIUM's Code of Ethics is a reference document and a behavioral guideline that reflects the organization's relationship and commitment to its stakeholders. This document is based on the values and principles that guide the development of our activities.

PENSIIUM'S COMMITMENTS TO BENEFICIARIES

- Working towards providing our services with the highest standards of transparency, simplicity, agility and responsibility.
- Guaranteeing ownership of the property.
- Paying residential care costs in advance (semi-annually).
- Providing responsible advice to programming beneficiaries.
- Carrying out a personalized assessment of funding needs for the coming years and their coverage through the rental of the property.
- Managing the rental of the property in a comprehensive and professional manner, with the highest guarantees and full transparency, as well as ensuring secure rental payments through the contracting of insurance policies.
- Only the minimum necessary interventions shall be carried out in order to make the property operational as quickly as possible, at market prices and with solvent tenants.
- Formalizing the Program transaction before a notary, complying with the highest transparency standards.
- Periodically providing personalized reports on the management of the property and the semi-annual progress of the Program.
- Making cancellation of the transaction available to beneficiaries at any time and at no cost.
- Maintaining a transparent policy regarding the costs derived from the Program services.
- All applications for assistance related to care services shall be assessed regardless of gender, race or beliefs.
- Guaranteeing the confidentiality of the personal information shared with us by our clients.
- Responding to any questions, enquiries or suggestions submitted by beneficiaries through the various communication channels as quickly as possible.

COMMITMENTS OF PENSIIUM BENEFICIARIES

- Acting responsibly in accordance with the provisions established in the Program.
- Complying with the operating rules governing our activities.
- Maintaining respectful relations with PENSIIUM staff.
- Making responsible use of the communication channels established.
- Using the advance financing exclusively for care services.

PENSIUM'S COMMITMENTS TO EMPLOYEES

- Promoting measures that help guarantee work-life balance, such as flexible working arrangements.
- Integrating the latest technological advances when promoting new ways of working, such as remote working.
- Guaranteeing equal opportunities through an open recruitment process free from discrimination based on gender, nationality, age, sexual orientation or any other diversity factor.
- Promoting the labor integration of people at risk of vulnerability and social exclusion.
- Ensuring a safe and stable working environment in compliance with the applicable regulatory framework.
- Promoting employee training and professional development.
- Acting with the highest possible level of internal transparency.
- Encouraging the involvement and participation of all professionals within our organization.
- Informing employees of the communication channels available to submit suggestions, complaints and opportunities for improvement.
- Promoting good governance by limiting the value of gifts that employees may receive from third parties, applying legislation relating to sexual harassment, conflicts of interest and the prohibition of drugs.

EMPLOYEE'S COMMITMENTS TO PENSIIUM

- Acting in accordance with PENSIIUM's mission and principles.
- Being familiar with the commitments set out in this Code of Ethics.
- Working to provide a high-quality service.
- Complying with internal health and safety regulations in the workplace.
- Making proper use of PENSIIUM's facilities and resources.
- Acting in accordance with the principles of fair competition and providing clear and transparent information about services.
- Avoiding conflicts of interest, as well as any measures that may give rise to bribery situations.
- Maintaining independence and impartiality when establishing relationships with the organization's various stakeholder groups.
- Making proper use of the established communication channels
- Respecting the confidentiality of all information derived from the activity.

PENSIIUM'S COMMITMENTS TO INVESTORS

- Based our relationship with investors on transparency, simplicity, agility, and accountability.
- Provide investors with a mechanism that enables them to monitor the company's financial performance.
- Deliver ongoing, transparent, and accurate information regarding the financial management of the operations carried out.

INVESTOR'S COMMITMENTS TO PENSIIUM

- Respect the confidentiality of business relationships, as well as the handling of data and all information arising from commercial activities.
- Maintain a professional and transparent relationship with PENSIIUM.

SUPPLIERS' COMMITMENTS TO PENSIIUM

- Supplier companies must be legally incorporated and comply with all applicable laws and regulations.
- Maintain a transparent, straightforward, agile, and responsible relationship.
- Respect the confidentiality of business relationships, as well as the data and information shared within the commercial relationship.
- Comply with operational rules and procedures within the facilities.
- Fulfill the agreed service delivery terms and conditions.

PENSIIUM'S COMMITMENTS TO SUPPLIERS

- Manage the business relationship in a transparent, straightforward, and responsible manner.
- Maintain rigor in the procurement of services.
- Wherever possible, ensure a long-term and sustainable relationship that delivers value to both parties through a commitment to service

PENSIUM'S COMMITMENTS TO THE LOCAL AREA AND COMMUNITY

- Responsibly promote, through collaboration with local social stakeholders, different financial solutions to help meet the economic needs of older adults.
- Implement a local engagement strategy with residential care centers aimed at identifying the potential needs of older adults while adapting services through a personalized approach.

PENSIUM'S COMMITMENTS TO ENVIRONMENT.

- Reduce the use of physical materials by promoting the use of technology.
- Reduce the impact of mobility through the use of technology and the strategic location of its offices.

PENSIVM has established a channel to receive inquiries and report potential breaches or irregularities related to the matters covered by this Code of Ethics: info@pensium.es



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