



CODE OF ETHICS



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01

LETTER FROM THE CEO

Our values in action



JAVIER LÓPEZ
CERRÓN

CEO

Grupo Orenes

“We all have a vital role to play in ensuring these principles form part of our daily work”

At Grupo Orenes, we believe that sustainable growth must be based on ethics, integrity and responsibility. **This Code of Ethics reflects our values**, our approach to business and the way in which we wish to interact with our teams, clients, suppliers and society.

We operate in a highly regulated, demanding and constantly evolving sector. For this reason, our commitment cannot be limited to mere compliance with the law. **We must act in an exemplary manner, with professionalism, transparency and respect**, both in Spain and in all the countries where we operate.

This Code provides us with clear guidance for making decisions and shaping our behaviour. **It sets out our key commitments regarding regulatory compliance**, responsible gaming, respect in the workplace, the prevention of corruption, environmental protection and the defence of human rights.

As Chief Executive, I take responsibility for promoting its implementation and fostering a strong ethical culture throughout the organisation. But ethics is a shared responsibility. **We all have a vital role to play in ensuring these principles form part of our daily work.**

I invite you to read the Code, make it your own and use it as a reference whenever you have any doubts. The trust and reputation of Grupo Orenes depend on our individual commitment.

02

WHY WE DO IT?

Purpose and scope of the
Code of Ethics

PURPOSE

The Code of Ethics Grupo Orenes (hereinafter, the 'Code') seeks to establish the principles, standards of conduct and framework of action that must govern the behaviour of all the professionals of the organisation, along with those third parties involved in the course of its activities.

The Code sets out the values and commitments that must underpin the activity of the Group, by strengthening a corporate culture based on integrity, responsibility and trust.

SCOPE OF APPLICATION

This Code **applies to all Grupo Orenes professionals, regardless of their position, role, employment category, or location**. Its provisions are enforceable in the course of all activities and wherever the Group operates.

Furthermore, it will be applicable, as appropriate, **to executives, directors, employees, suppliers, commercial partners and other third parties** interacting with the Group, who must act in accordance with the principles established here; they must also know, understand and undertake to comply with this Code.

The Group will encourage key third parties, including suppliers and commercial partners, to expressly commit to complying with the Code of Ethics..

COMMITMENT OF THE ORGANISATION

Grupo Orenes fosters a compliance culture, ensuring respect for the applicable international and national legislation, and developing policies, procedures and internal checks to foster compliance.

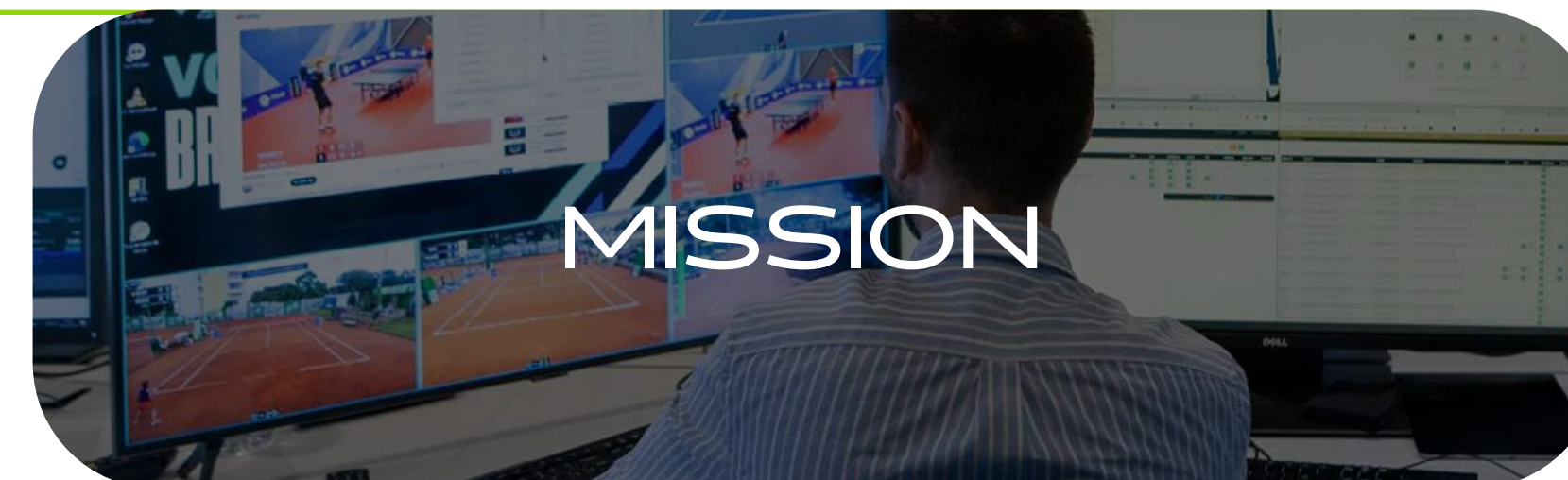
The principles of this Code supplement the existing legislation, internal regulations and the voluntary commitments undertaken by the organisation..

03

ORENES DNA: ABOUT US

Mission, vision, values and
ethical culture

‘To provide all our customers with a comprehensive leisure offering with the emphasis on enjoyment and responsible gaming.’



‘To be leaders in the leisure sector by exceeding our customers’ expectations through excellence in service and management based on transparency, professionalism and responsible gaming.’



EXPERIENCE: Nearly 60 years in the industry providing high-quality service to our customers and incorporating state-of-the-art technologies.

TRUST: Placed in us by our stakeholders based on a relationship founded on transparency and mutual understanding.

COMMITMENT: to all our stakeholders.



OUR
PILLARS

Orenes Pride

We are proud to be part of Grupo Orenes, and assuming the responsibility of protecting its reputation, its values and its compliance culture.

Respect

For people, by fostering an environment based on dignity, equal opportunities, inclusion and collaboration.

Ethics

We act with integrity and coherence in all our decisions and actions.

Neutrality

We make objective, independent and impartial decisions, by avoiding situations that compromise our professional judgement.

Excellence

We strive for continuous improvement in everything we do, with rigor, professionalism and responsibility.

Sincerity

We express ourselves with honesty, transparency and good faith.

04

OUR PRINCIPLES: OUR WAY OF ACTING

Principles of ethical and
responsible conduct

WE COMPLY WITH THE LAW AND OUR RULES

ALIGNMENT WITH INTERNATIONAL STANDARDS AND GOOD GOVERNANCE PRACTICES

The Group uses the main international ethics and compliance standards and frameworks as a benchmark. The organisation is likewise committed to respecting human rights in accordance with **the Universal Declaration of Human Rights**.

PREVENTION OF MONEY LAUNDERING

Grupo Orenes is firmly committed to preventing money laundering and the terrorist financing and not allowing its activity or resources to be used for unlawful purposes.

It therefore has specific **procedures and policies** in place and it fully cooperates with the relevant **authorities, by complying with the legal obligations** to prevent, oversee and report suspicious operations.

COMMITMENT TO REGULATORY COMPLIANCE

The Group is committed **to strict compliance with applicable legislation** and of the applicable obligations in the jurisdictions in which it operates. No strategic, economic, operational or commercial target may **justify the failure to comply with those obligations**.

FAIR COMPETITION

Grupo Orenes competes fairly in the markets in which it operates, **respecting competition laws** and avoiding any anti-competitive practices, including agreements with competitors to fix or alter prices or restrict free competition.

The Group **prohibits** any action that entails unfair competition practices; it **undertakes** to ensure compliance with applicable competition/antitrust laws in the countries where it operates.

WE ACT WITH INTEGRITY

INTEGRITY, OBJECTIVITY AND PROFESSIONAL AUTONOMY

Grupo Orenes professionals will always act with **integrity, honesty and objectivity**, avoiding any fraudulent conduct, conflict of interest or action that threatens the trust placed in the organisation.

Furthermore, Grupo Orenes will foster an environment that **guarantees independence and professional excellence**, by encouraging a culture based on ethics, responsibility and professional judgement..

PROFESSIONAL LOYALTY

Grupo Orenes professionals will act with loyalty and in good faith, safeguarding the **interests of the organisation** and avoiding any conduct that could be detrimental.

When a professional publicly reveals their identity as a member of the Group, they must act **responsibly, respectfully and in line with the values and principles of this Code of Ethics**.

PUBLIC AND BUSINESS CORRUPTION

Grupo Orenes acts in accordance with the **principles of legality, transparency, and integrity** in all its relations with the public and private sectors. There is zero tolerance of any practice that involves bribery, influence peddling or obtaining undue advantage, thus guaranteeing that the business decisions are adopted in an ethical and **objective way and in** keeping with applicable legislation.

GIFTS AND INVITATIONS

‘Gift’ and ‘present’ are taken to mean for the purposes of this Code any type of courtesy, favour, or compensation, whether in cash or in kind, offered or received by a professional.

Grupo Orenes professionals will not offer or accept gifts, presents or any other benefit that may influence – or appear to influence – decision making. They may only accept tokens of symbolic value or those that **are expressly authorised by the General Management and notified to** the Compliance Department.

Furthermore, any form of **bribery, commission, payment or unfair advantage is** forbidden, along with the use of influence to obtain favourable treatment from authorities, customers, suppliers or third-parties.

CONFLICT OF INTEREST

A conflict of interest exists when the direct or indirect professional, economic, family or personal interests of a person can influence or compromise their objectivity, independence or ability to make decisions to benefit the organisation.

Anybody who is, or may be, in a conflict of interest must notify the Compliance Department for the situation to be assessed and abstain from intervening in the decisions in question until the situation has been settled.

Grupo Orenes has **measures in place to prevent conflicts of interest**, which include the guiding principles set out in this Code and which must govern the activity of everyone subject to it.

WE RESPECT PEOPLE

RESPECTING PEOPLE AND RIGHTS IN THE WORKPLACE

The professionals are **the company's most important resource**. Their alignment and commitment to the Group's strategy are fundamental for the organisation to be able to achieve its goals.

In the employment context, the Group guarantees **freedom of association, trade union rights, and collective bargaining rights for all its professionals**.

MORAL INTEGRITY

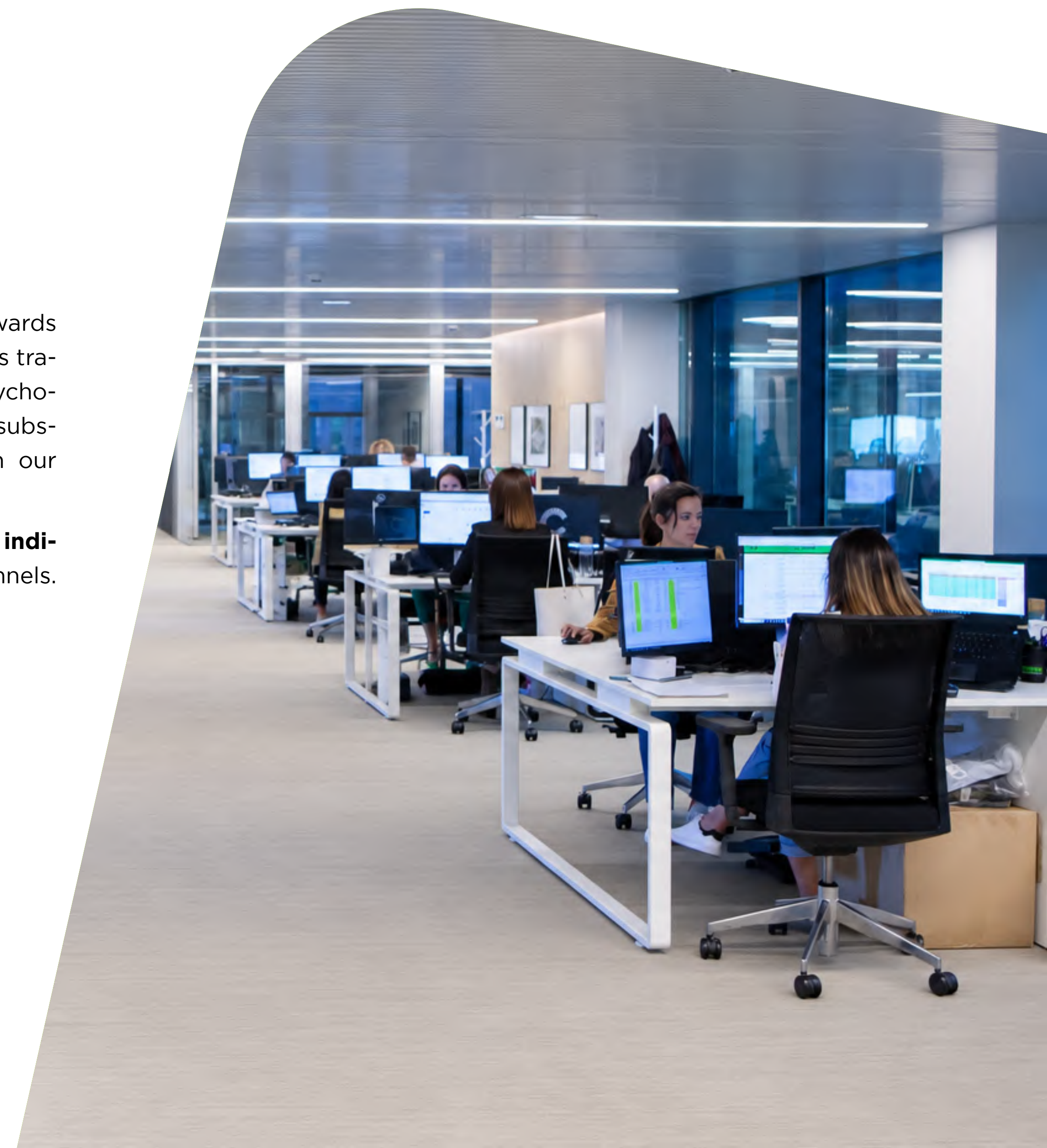
The Group fosters a professional environment based on **respect, dignity and equal treatment**; it expressly rejects any abusive behaviour, sexual harassment or degrading treatment.

Everyone who is part of the organisation must behave in an **ethical and respectful** manner, contributing to a safe work environment and free of conduct that breaches fundamental rights.

PUBLIC HEALTH, PROSTITUTION AND CORRUPTION OF MINORS

Grupo Orenes has a **zero-tolerance policy** towards prostitution and corruption of minors, as well as trafficking in or using toxic drugs, narcotics or psychotropic substances, which may potentially take place on our premises.

In this regard, the Group's staff must **report any indication** of such activities via the designated channels.



WE PROTECT INFORMATION AND RESOURCES

APPROPRIATE USE OF RESOURCES AND CONFIDENTIAL INFORMATION

The Organisation's professionals must use the Grupo Orenes resources and assets **responsibly and exclusively for professional purposes**, unless expressly authorised otherwise. This duty includes all third-party assets used in the course of business.

Furthermore, they must protect the confidential information of the organisation and of third parties, by avoiding its dissemination or improper use even after the end of the professional relationship. Any third-party information must be obtained and used **only by lawful means and as per the applicable legislation**.

The duty to protect confidential information continues even after the end of the professional or employment relationship with the company.

RIGHT TO PRIVACY AND PROTECTION OF PERSONAL DATA

Grupo Orenes guarantees the right to privacy and the protection of personal data, ensuring they are treated as confidential and in accordance with the applicable legislation.

The Group is committed to safeguarding the confidentiality and integrity of personal data for which it acts as a data controller or data processor. Personal data shall not be disclosed to any third party unless such disclosure is permitted by applicable law or is required to comply with legal obligations, judicial orders, or administrative rulings.

The professionals must only process the personal data to carry out their duties, and must avoid any unauthorised access, use or dissemination.

Any query regarding their processing should be sent to the **Data Protection Officer at dpo@orenegrupo.com**.

INTELLECTUAL AND INDUSTRIAL PROPERTY

The Group's professionals will refrain from any unlawful use of the creations, works, distinctive signs or, in general, **the industrial and intellectual property rights of competitors and third parties**.

The intellectual property created in the workplace or using company resources **belongs to the Grupo Orenes** and cannot be used for personal purposes.

USE OF SOCIAL MEDIA

Professionals must **use social media and digital platforms responsibly. Unauthorised use of the name, brands, logos or any other Grupo Orenes identifier is forbidden**,

as is disseminating content that may harm the reputation of the organisation or violate the dignity of employees, associates, customers, partners or third parties.

This prohibition includes **both direct use and through any form of association** that third parties may take to be an official affiliation with the Group.

ETHICAL AND RESPONSIBLE USE OF ARTIFICIAL INTELLIGENCE

The organisation will foster the **responsible, ethical, safe and transparent** use, development and rolling out of Artificial Intelligence (AI) based solutions; while always guaranteeing compliance with applicable legislation, internal policies and the principles set out in this Code of Ethics.

The application of these technologies **must respect fundamental rights, the privacy of people, along with the principles of integrity, equity and non-discrimination**.

All professionals must use AI tools **diligently and with professional judgement**, only employing the solutions authorised by the organisation, protecting confidential information and personal data, and checking the reasonableness of the results prior to using them.

WE PROMOTE RESPONSIBLE GAMING

Grupo Orenes considers entertainment to be **a responsible, transparent and safe environment**, where an essential principle of its approach is the protection and wellbeing of its customers.

It therefore **promotes responsible gaming** by means of in-service training of its professionals and the implementation of measures aimed at preventing the risks associated with gaming, which include:

-  **Access controls** to prevent participation **by minors and by persons registered on self-exclusion** or access-ban lists.
-  Working **with the competent authorities and reporting illegal activities**.
-  Measures to prevent **sports fraud**.
-  **Responsible gaming** awareness-raising and information actions.
-  **Cooperation** with specialized entities dedicated to the **prevention and treatment of gambling addiction**.

The organisation provides its customers with detailed and easily accessible information at all its establishments, on how games of chance work and always encouraging conscious decisions.



A large, curved aerial photograph of a city, likely Madrid, showing dense urban architecture with red-tiled roofs and a clear blue sky with scattered clouds. The image is positioned on the left side of the page, partially overlapping the text area.

WE ACT RESPONSIBLY WITH SOCIETY

ETHICAL CULTURE AND SOCIAL RESPONSIBILITY

Grupo Orenes fosters a corporate culture based on **ethics, integrity and responsibility**, by embedding those values in all its professional relations, decisions and activities.

Grupo Orenes also embraces its commitment to social responsibility by including good governance and social criteria in its strategy. This commitment takes the form of **respecting human rights, sustainable development and protecting the environment**.

All of the Group's professionals share responsibility for maintaining and strengthening this **ethical culture** and for acting in a way coherent with the corporate values, thus contributing to the reputation, sustainability and responsible growth of the organisation.

ORENES
Sports Bar & Salón de Juego

05

**OUR
COMMITMENT:
OUR TARGET
RECIPIENTS**

Our commitment to stakeholders

Grupo Orenes will strive to ensure its customers, suppliers, partners and third-parties with whom it interacts know the Code of Ethics in order to **facilitate the appropriate application of the principles** and values established in it.

CUSTOMERS

Grupo Orenes undertakes to offer **top quality** products and services, in accordance with legislation and the applicable legal standards, guaranteeing a relationship based on **transparency, trust and respect for the rights of its customers**.

PUBLIC ADMINISTRATIONS AND INSTITUTIONS

The Group and its professionals will relate with the Public Administrations in **an ethical and lawful way**. They must not try to influence the decisions of the Administrations; any conduct aimed at **obtaining favours or which may lead to a lack of integrity and transparency** is prohibited. In general, contributions made by or on behalf of the Group, to political parties, authorities, agencies, Public Administrations and institutions in general are not allowed.

PARTNERS

The Group will establish with its joint venture partners a working relationship based on trust, transparency in information and pooling of knowledge, experience and skills, to achieve common goals and for their mutual benefit; they must require their employees to apply **the same ethical principles** as if they were in-house employees. The Group will foster knowledge of this Code among its partners for the better application of the principles contained in it.

SHAREHOLDERS AND DIRECTORS

The Group is firmly committed **to transparency, accurate and timely communication and the protection of the rights of its shareholders**. It therefore guarantees equal access to the information and promotes responsible management, aimed at creating sustainable value and bolstering trust in the organisation.

Grupo Orenes will promote a work **environment based on respecting equal opportunities, diversity and labour rights.**

EMPLOYEES

EQUALITY, DIVERSITY AND LABOUR RIGHTS

Grupo Orenes will promote a work environment based on respecting equal opportunities, diversity and labour rights. **The organisation will foster integration, non-discrimination and the equitable treatment of everybody**, thus guaranteeing fair and decent employment conditions.

Furthermore, **it will ensure compliance with current legislation.** and the creation of an inclusive environment that fosters the **personal and professional development** of the employees.

The organisation will act according to the applicable international standards; it will avoid any negative impact on the fundamental rights of individuals and adopt the necessary measures to prevent, mitigate and, when possible, remedy possible non-compliances.

SAFETY AND WORKPLACE WELLBEING

The Group considers promoting the introduction of the best health, safety and wellbeing practices to be fundamental. Accordingly, the organisation has a **zero tolerance** culture regarding breaches of occupational health and safety regulations.

TRAINING AND SKILLS DEVELOPMENT

Grupo Orenes will foster **in-service training and the professional development of its employees**, by encouraging the acquisition and updating of knowledge and skills. The organisation will promote a learning environment that encourages continuous improvement, performance **excellence and adaptability** to environmental changes.

OBJECTIVE ASSESSMENT AND PROMOTION

All Group professionals are selected, remunerated, and promoted based solely on the fit between candidate profiles and the specific requirements of the role. No other factor may influence or affect the objectivity of these decisions.

A core guiding principle in the organisation is **to provide the same equal employment and professional promotion opportunities**, and always ensuring that there is no discrimination. on the grounds of gender or sexual orientation, race, religion, disability, origin, civil status, age or social status.

Grupo Orenes considers its suppliers to be a key aspect for conducting its business and it fosters relationships based on **transparency, equal treatment and mutual benefit.**

SUPPLIERS

Grupo Orenes considers its suppliers to be a key aspect for conducting its business and it fosters relationships based on **transparency, equal treatment and mutual benefit.**

Suppliers must act according to the principles of this Code, complying with the applicable legislation, particularly regarding human rights, working conditions, occupational health and safety, protecting the environment, quality, safety and business integrity.

Furthermore, **any form of bribery, improper advantage, or conduct aimed at obtaining confidential information or improperly influencing the Group's decision-making process is strictly prohibited.**

Grupo Orenes will foster **objective processes to assess and select suppliers**, according to criteria of quality, efficiency, cost and commitment to the principles of this Code.

The Group's professionals may **not use their position to obtain personal benefits** in their relationships with suppliers. No professional may receive gifts from suppliers in the form of money, high value services or articles – whether or not promotional – or which reasonably exceed what is considered as common courtesies.

Furthermore, the professionals will avoid giving gifts than can lead to situations of conflict or affect the independence of the suppliers, or which can be misinterpreted by third parties.

Suppliers will be required **to treat confidentially the information to which they have access in the course of their relationships with the Group**; they may only use it for the authorised purposes and must always comply with the applicable protection of personal data legislation.

By the same token, the prices and information submitted by the providers and suppliers in a selection process will be treated confidentially; they will not be disclosed to third parties without the consent of the data subjects and except in the cases where there is a legal obligation or to comply with administrative or court rulings.

Grupo Orenes embraces sustainability as an essential principle of its management, by integrating environmental criteria in decision making and in the course of its activities.

SOCIETY AND THE ENVIRONMENT

The Grupo Orenes' commitment to the environment entails responsible action aimed at improving resource efficiency, reducing energy consumption and minimising impacts associated to its activity.

Grupo Orenes embraces sustainability as an essential principle of its management, by integrating environmental criteria in decision making and in the course of its activities. Accordingly, it undertakes to prevent pollution, use resources responsibly and to strive for the continuous improvement of its environmental performance.

Furthermore, the Group guarantees compliance with **the applicable environmental legislation** and stresses the adoption of those principles in its relationship with suppliers and external partners



06

HOW DO WE ENSURE OUR ETHICAL CULTURE?

Whistleblowing Channel, Compliance
and disciplinary system

WHISTLEBLOWING CHANNEL

The Whistleblowing Channel is Grupo Orenes means **to facilitate the confidential and anonymous** (as applicable) reporting of irregularities that may arise from regulatory breaches or contrary to the **Code of Ethics**; it is available to the professionals, customers, suppliers, partners and anybody related with the Group.

The reporting must be made in good faith, based on prima facie evidence, and comply with the principles of truthfulness, proportionality and accountability.

There are different communication options to facilitate access **to the channel**:

-  **Corporate platform** accessible through the website <https://orenegrupo.com/canal-etico>
-  **By post** to the corporate headquarters, addressed to the Compliance Director, at [Avda. de Alicante, N° 170, 30007 Murcia, Spain.](#)
-  Via **email** at canal.etico@orenegrupo.com, although reports submitted through this channel may not be anonymous.

Notwithstanding these means of access, the whistleblower can also contact the **Independent Authority for the Protection of Whistleblowers** or those external channels envisaged in the applicable legislation.

“The Whistleblowing Channel is the channel provided by **Grupo Orenes to facilitate confidential and, where appropriate, anonymous reporting** of irregularities that may constitute breaches of regulations or contravene our Code of Ethics.”



MANAGING COMMUNICATIONS AND GUARANTEES OF THE PROCESS

Management of the Whistleblowing Channel and investigating the reports received are assigned to the **Internal Information System Manager**, appointed by the Board of Directors; will act independently and have the necessary resources and autonomy to conduct a **professional and objective investigation** into the alleged facts. If the report is made against that person, an alternative manager will be appointed.

Notwithstanding the above, local handlers may be appointed in those jurisdictions where deemed appropriate for regulatory, operational and/or organisational reasons. Those handlers will act as per the internal procedures of the Group and with the duties assigned to them; in any event, **appropriate coordination with the Whistleblowing Channel Manager will be guaranteed.**

The whole investigation and processing procedure will take place with the following guarantees:



Confidentiality: the identity of the whistleblower is confidential information and will not be disclosed to the reported party without the consent of the former; the channel also accepts anonymous reports.



Non-retaliation principle: the Group will not take any direct or indirect retaliation against anybody who reports a possible irregularity in good faith.



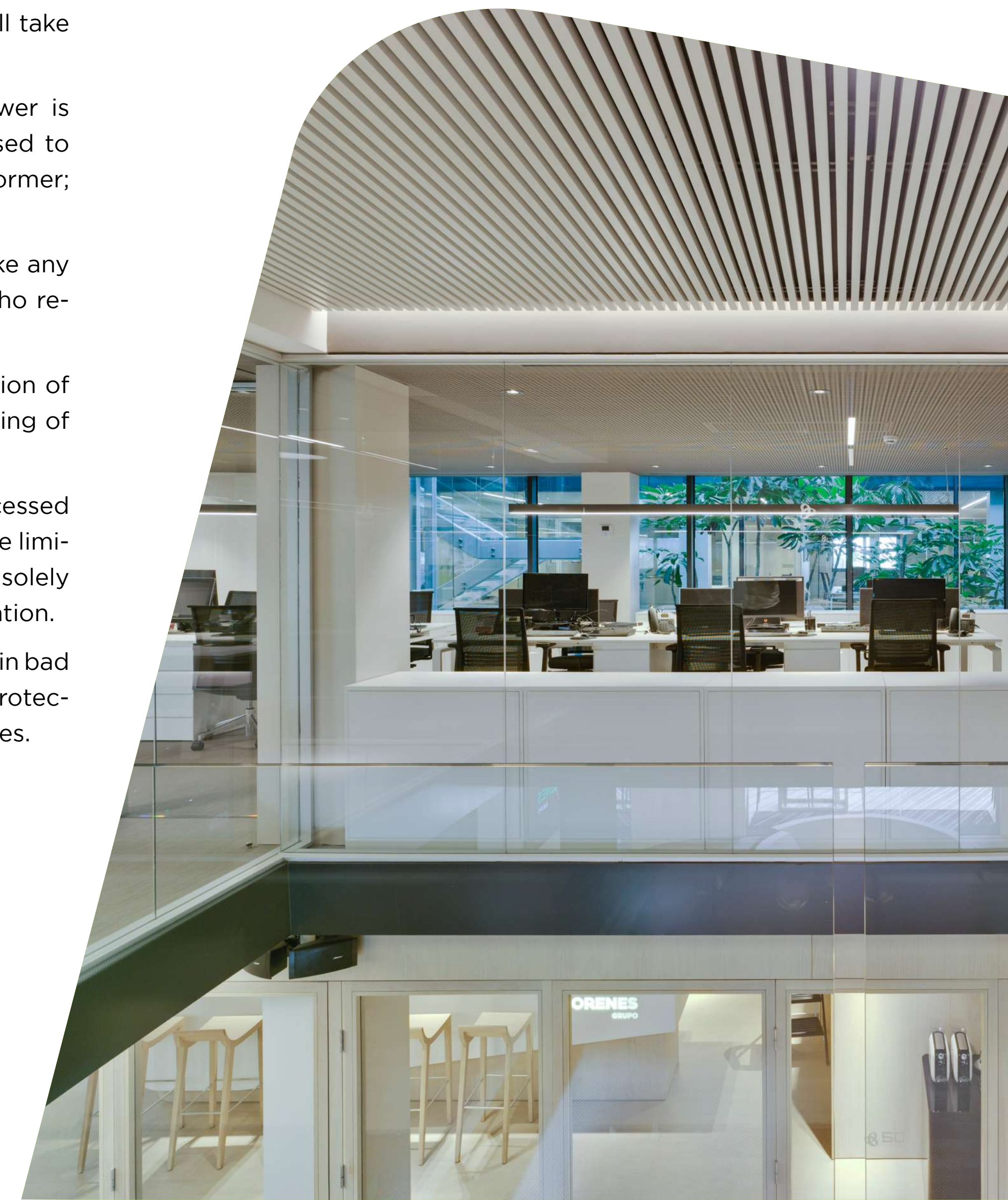
Rights of the investigated party: the presumption of innocence, the right to defence and the respecting of their privacy will be guaranteed.



Data protection: the personal data will be processed according to the principles of lawfulness, purpose limitation, data minimisation and storage limitation, solely during the time needed to conduct the investigation.



Good faith: false communications or those made in bad faith or involving an abuse of rights will not be protected and may lead to legal or disciplinary measures.



DISCIPLINARY SYSTEM

Failure to comply with this Code and the other rules and regulations may lead to the **disciplinary system being triggered as per employment legislation and the current in-company disciplinary policy**, along with the taking of any and all criminal, employment, civil and legal actions as may be necessary.

The application of the in-company disciplinary system is governed by the following fundamental principles:

-  • **Legality and typicity**, in accordance with the applicable criminal, administrative, civil, mercantile and labour legislation.
-  • **Proportionality**, in accordance with the severity of the facts and the harm caused.
-  • **Presumption of innocence** and right to defence.
-  • **Confidentiality** and personal data protection.
-  • **Due process**, with respect to the established internal procedures.

The disciplinary system will apply to **all individuals and entities subject to the Code of Ethics**.

THE COMPLIANCE FUNCTION

The Compliance function is entrusted with fostering, overseeing and guaranteeing compliance of the applicable legislation, along with the principles and values set out in this Code of Ethics.

The **Compliance** function within the organization is carried out by the **Compliance Department**.

This function may be performed at local and/or corporate level, in accordance with the organisational structure established in each company of the Group, acting autonomously and independently; they will have direct **access to Senior Management and the competent governing authorities**.

REVIEW, UPDATING AND APPROVAL

This Code of Ethics will be **reviewed periodically to ensure it is in line with current legislation**, with the evolution of Grupo Orenes business and compliant with best practices.

The Compliance Officer will oversee and coordinate its review and propose any necessary amendments.

The Board of Directors as the competent authority of the organisation will be in charge of approving the Code of Ethics, along with its subsequent amendments.

COMMUNICATION, DISSEMINATION AND TRAINING

The Code of Ethics will be available on the Grupo Orenes corporate website and through its internal channels.

The organisation will promote awareness of **the code by means of communication actions, regular** training and awareness raising, adapted to the duties and responsibility of its professionals; it will likewise foster the use of the channels set up to submit queries and report possible breaches.

These initiatives may be extended, when necessary, to third parties with whom the Group has key professional relationships.

07

OUR "MORAL COMPASS"

If in doubt, ask yourself

The Code is best followed when interpreted with common **sense and sound judgement**. When in doubt, it is best to ask. So, before making a decision, ask yourself:



Can I do it? Do I have the authority to do it?



Would I feel comfortable explaining it to my manager, my family or my colleagues?



Is it what must be done?



Does it reflect well on my image and that of the Grupo Orenes?



Is it legal and compatible with this Code and our values?



Would I like to be in the news for this reason?

If the answer to any of these questions is ‘**no**’ – or you are not sure –, **stop and consult your line manager or the Compliance Department**.

SOME EXAMPLES:



A supplier offers you a gift that is more than just a token.

Do not accept it and inform the Compliance Department.



You are involved in selecting a supplier with whom you have a personal or family tie.

Report the possible conflict of interest and do not take part until a decision has been made.



You discover a practice that could be contrary to the law or this Code.

Report it using the Whistleblowing Channel: your identity will be kept confidential and no retaliation will be tolerated.

ASKING FOR HELP IS THE RIGHT DECISION

At Grupo Orenes, we do not expect everyone to have all the answers.

Integrity also means knowing when to seek guidance.

Your commitment protects people, our customers, and Grupo Orenes.



WHO CAN I TURN TO?

Operational or day-to-day question → **Manager**

Ethical or conduct dilemma → **Compliance**

Conflict of interest → **Compliance**

Protection of personal data → **DPO**

Possible fraud, corruption or bribery → **Whistleblowing Channel**

Possible non-compliance or irregularity → **Whistleblowing Channel**

If in doubt, ask.

Doing the right thing is always the best decision.

OUR CODE OF ETHICS AT A GLANCE

OUR WAY OF ACTING, DECIDING AND RELATING

01 ORENES DNA ABOUT US



MISSION

To offer entertainment and leisure experiences based on emotion, excellence and responsible gaming.

VALUES



Experience



Trust



Commitment

ORENES PILLARS

O

Orenes
Pride

R

Respect

E

Ethics

N

Neutrality

E

Excellence

S

Sincerity

02 OUR PRINCIPLES THE WAY WE ACT



WE COMPLY

We act according to the law, our internal regulations and ethical standards.



WE ACT WITH INTEGRITY

We make responsible, objective and honest decisions.



WE RESPECT PEOPLE

We foster an environment based on dignity, equality and respect.



WE PROTECT TRUST

We take care with information, resources and the reputation of Grupo Orenes.



WE PROMOTE RESPONSIBLE GAMING

We protect customers and vulnerable groups.



WE ACT WITH SOCIETY

We contribute to sustainable development and respect for the environment.

03 OUR COMMITMENTS OUR TARGET RECIPIENTS



CUSTOMERS

Transparency ·
Service quality ·
Responsible gaming



PROFESSIONALS

Equal opportunities ·
Professional development ·
Safety and wellbeing



SUPPLIERS AND PARTNERS

Integrity ·
Objectivity ·
Responsible Relations



PUBLIC ADMINISTRATIONS

Collaboration and transparency ·
Institutional respect ·
Integrity



SHAREHOLDERS

Creating sustainable value ·
Good governance ·
True information



SOCIETY

Sustainable development ·
Human rights ·
Protecting the environment

04 OUR GUARANTEES HOW TO ENSURE THEM



Whistleblowing
Channel



Compliance
Officer



Training and
awareness raising



Protecting the
whistleblower



Objective and
independent investigation



Disciplinary
system

05 OUR "MORAL COMPASS" IF IN DOUBT, ASK YOURSELF



Can I do it?



Is it what must
be done?



Is it legal and
compatible
with this Code?



Does it reflect
our values?



Do I feel
comfortable
explaining it?



Does it
protect the
Grupo Orenes'
reputation?



If the answer to any question is 'no' or you are not sure, stop and ask.

06 DO YOU NEED HELP OR DO YOU WANT TO REPORT AN IRREGULARITY?



PLATFORM

oreneshgrupo.com/canal-etico



BY POST

Compliance Director
Avda. de Alicante 170 30007 Murcia



EMAIL

canal.etico@oreneshgrupo.com



- ✓ Confidentiality
- ✓ No retaliation
- ✓ Option for anonymous reporting

