



Ethical Code

Resa

Índice

1. Definition
2. Purpose
3. Recipients
4. Mission, Vision and Values
5. General Rules of Conduct
6. Guiding principles for our stakeholders:
 - a. Employees
 - b. Customers
 - c. Partners and Universities
 - d. Suppliers and subcontractors
 - e. Shareholders' rights
 - f. Corporate social responsibility

Definition

Principles Guiding Our Professional Conduct at Resa

At Resa, we are committed to acting with integrity and responsibility in all our activities and working relationships. This code of ethics reflects our commitment to values that ensure exemplary professional conduct, whilst always complying with applicable laws. We aim to foster relationships based on trust and respect with our employees, customers, suppliers, shareholders and society at large, ensuring that every action taken by the company is aligned with the principles of ethics and responsibility that define us.

Purpose and recipients

Our Commitment to Ethics at Resa

At Resa, we have adopted a code of ethics that reflects our firm and explicit commitment to adhering to clear principles of conduct. This commitment is underpinned by our strict adherence to these standards, ensuring that all our actions are guided by ethics and responsibility.

Scope of Resa's Code of Ethics

Resa's Code of Ethics applies to all our employees, who must be familiar with it, accept it and undertake to comply with it from the moment they join the company. Furthermore, suppliers, subcontractors, customers and any third parties that have dealings with Resa—hereinafter referred to as stakeholders—shall also be subject to the principles of this Code to the extent that they apply to them.

Mission, Vision and Values



Mission



To provide the best residential or co-living experience. We create vibrant, cheerful and safe environments that promote the well-being of those who are at a similar stage in life

Vision



We want to be the top choice for accommodation for students and young professionals in every city where we operate

Values



RESPONSABILITY

We prioritise the well-being of our residents and create safe communities. We promote sustainability, diversity and social initiatives for a better future.



TEAM

We encourage collaboration and personal development. We aim to attract and develop talent by creating a working environment that inspires pride and commitment.



SERVICE

We focus on creating unforgettable experiences and constantly innovating to surprise our residents and leave a lasting impression on them.



AUTHENTICITY

We value transparency and integrity, acting with honesty, taking responsibility and upholding high ethical standards.



General rules of Conduct



1

Commitment to Human and Labour Rights

We adhere to the United Nations Global Compact and the declarations of the International Labour Organisation, ensuring full respect for human and labour rights in all our activities.

2

Zero Tolerance for Criminal Offences

Through our corporate prevention system, we reaffirm our stance of zero tolerance towards any criminal conduct, ensuring regulatory compliance and the integrity of our organisation.

3

Ethical and Fair Competition

We promote responsible competition, strictly complying with competition law and always acting with transparency and integrity in the marketplace.

4

Environmental Commitment and Sustainability

We strive to minimize our environmental impact by complying with regulations and promoting sustainable policies that foster environmentally responsible development.

5

We look after your safety and well-being at work

We are committed to ensuring the safety and well-being of our employees by providing the necessary resources to work in a safe and healthy environment. We promote the prevention of workplace risks through ongoing training and compliance with all applicable regulations. Every employee is responsible for following safety rules and using the equipment provided correctly to protect their own health and that of others. Furthermore, we ensure that our suppliers and subcontractors comply with the same health, safety and environmental regulations.

Guiding principles for our stakeholders

- › Employees
- › Customers
- › Partners and Universities
- › Suppliers
- › Rights of shareholders
- › Corporate social responsibility



01. Employees



01. Employees

COMPLIANCE WITH APPLICABLE REGULATIONS

All employees must ensure that they comply with the laws and regulations of the place where they work, whilst always honouring the commitments that Resa has made to third parties.

PROFESSIONAL DEVELOPMENT

Information on profesional development

- ✧ All employees will be informed of the principles and criteria that guide their professional development, the effective performance of their duties and the strengthening of their commitment to the company's objectives.

Commitment to training

- ✧ Every employee is responsible for their own continuous professional development, making use of the resources Resa provides to keep up to date and improve their skills, with the aim of achieving their full professional potential and meeting their goals.



- ✧ **Internal promotion**
Promotion opportunities within Resa are based on the principles of ability, competence and professional merit. Promotion decisions are made using clear, objective and transparent criteria, and all employees are aware of the tools used to assess their performance and results.
- ✧ **Work-life balance**
The company promotes a healthy balance between personal and professional life through human resources policies designed to harmonise work commitments with time dedicated to personal and family development.

01. Employees

* **Commitment to equality and respect**

At Resa, we ensure a working environment based on equal opportunities, fair treatment and respect, eliminating all forms of discrimination.

* **A safe and respectful workplace**

We reject any behaviour that creates an intimidating atmosphere, promoting a workplace where everyone feels valued and safe. To this end, we have clear policies in place that reinforce the prevention of harassment in all its forms.



RESPONSIBLE MANAGEMENT AND PROTECTION OF COMPANY RESOURCES

At Resa, we provide our employees with the resources they need to carry out their duties efficiently, trusting in their commitment to use them responsibly and with care.

Use of technological resources.

- * Computer systems, email and the internet must be used exclusively for work purposes. These resources may be monitored through audits to ensure they are used appropriately and in line with company policies.

Management of financial resources

- * It is the responsibility of every employee to use the allocated financial resources correctly, in accordance with internal policies on travel and entertainment expenses. Integrity in the use of company assets and external relations.
Any free transfer of company assets or services must be authorised in advance. Furthermore, employees must not solicit or accept gifts or benefits that could influence their professional decisions. Any attempt at external influence must be reported immediately, in line with our Anti-Corruption Policy.

01. Employees

✧ **Management of conflicts of interest and business opportunities**

At Resa, we value transparency and ethical conduct in all our activities. For this reason, employees must inform their line managers of any potential conflict of interest between themselves—or people close to them—and the company.

✧ **Exploitation of opportunities**

Business opportunities or information obtained in the course of their duties must not be used for personal gain or to favour related third parties. Acting with integrity is essential to protect Resa's interests and maintain trust in our professional relationships.

Compatibility of activities and confidentiality

At Resa, employees may not engage in external activities, whether paid or unpaid, that are incompatible with their work responsibilities within the company.

✧ **Data Protection**

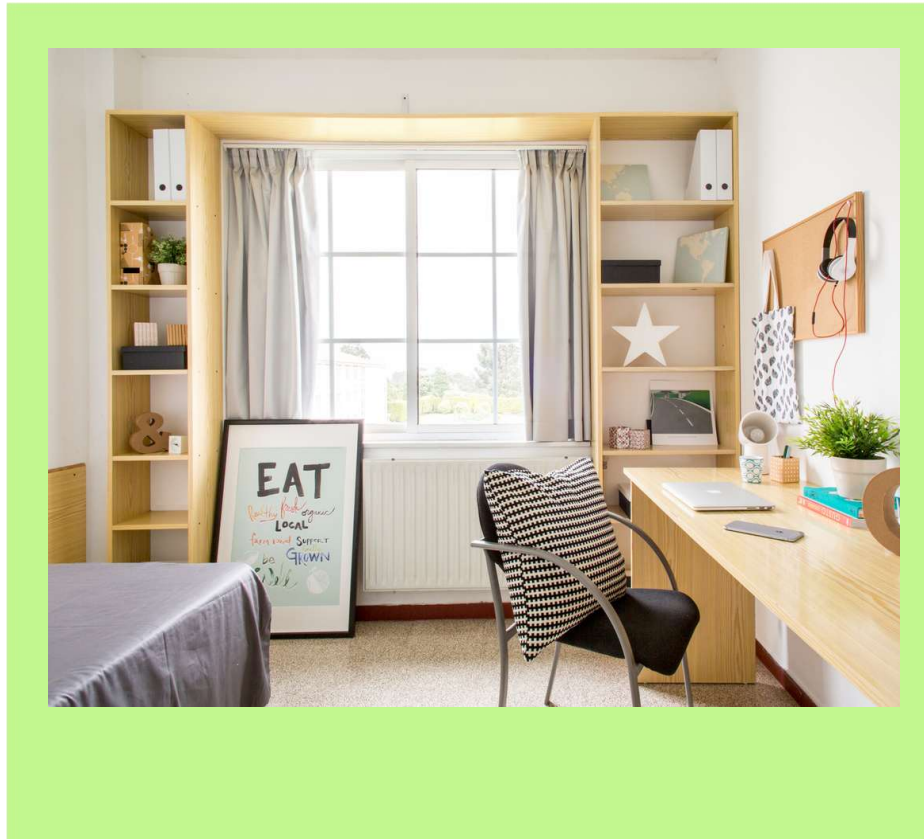
All employees are obliged to safeguard any confidential or proprietary information to which they have access, whether technical, financial, commercial or of any other nature. This information must not be used outside the workplace or shared with third parties without prior written authorisation, unless required to do so by a competent authority.

Employees with access to particularly sensitive information may be required to sign additional confidentiality agreements. Furthermore, Resa guarantees strict compliance with data protection regulations, taking all necessary measures to ensure their proper application for the benefit of employees, customers and partners.



01. Employees

What does RESA expect of you?



What does RESA expect of you?

Managing conflicts of interest

- 1 Inform your manager and Human Resources of any potential conflicts of interest, agree on how to manage them, and obtain their approval before taking any action.

Responsability and safety

- 2 Comply with health and safety regulations, take action if safety is at risk, and report hazards to prevent accidents.

Privacy and data

- 3 Respect privacy in your day-to-day decisions. Do not store or share personal data without prior authorisation.

Respect and diversity

- 4 Value differences, be sensitive to the needs of others and foster a respectful working environment. Challenge discriminatory behaviour through the established channels.

Development and collaboration

- 5 Take an active role in your own development and contribute to a safe and positive working environment.

Objective criteria

- 6 Make decisions based on objective criteria and avoid compromising situations with third parties. Follow the protocols on gifts.

Confidentiality and information

- 7 Protect confidential information, avoid sharing it with third parties, and ensure the accuracy of the data in your care.

Sustainability

- 8 Be familiar with Resa's environmental policies and help minimise our environmental impact.

Respectful representation

- 9 Respect others' opinions and do not speak on behalf of Resa on political, social or religious matters.

Proactivity and brand

- 10 Strengthen relationships with partners and local communities, acting as a good ambassador for the Resa brand and its values in your local area.

02. Customers



02. Customers

* **CONFIDENCIALITY AND EXCELLENCE IN SERVICE**

At Resa, we protect all information arising from our customer relationships, strictly complying with data protection regulations.

We know that the success of these relationships depends on the excellence of the services we provide. That is why we equip our teams with the necessary resources to carry out their work to the highest standards of quality.

Customer relationships

* All our customer relationships are documented clearly and transparently, ensuring that rights and obligations are precisely defined. We are committed to building relationships based on trust and mutual respect.

We strive to make every student's stay unforgettable, fostering their all-round development and promoting inclusivity through efficient, affordable solutions tailored to diverse audiences.



03. Partners and Universities



03. Partners and universities

* RELATIONSHIP WITH PARTNERS AND UNIVERSITIES *

At Resa, we recognise that our strategic alliances with universities and other partners are essential to the development and success of our business model. We are therefore committed to maintaining relationships based on the principles of **integrity, transparency, collaboration and mutual respect**, always aligning ourselves with the values of our partner institutions.

* Commitment to educational quality and student wellbeing:

All our actions are aimed at enhancing students' university experience, ensuring that our halls of residence are environments that foster their academic, personal and social development.

* Responsible and transparent collaboration:

We work closely with universities and partners, ensuring that all agreements and projects are managed ethically, in compliance with current regulations and the commitments made.

Conflicts of interest and confidentiality

* We are committed to avoiding conflicts of interest in our relationships with universities and partners, prioritising the interests of students and educational communities. Furthermore, we guarantee the confidentiality and respect of shared information, complying with data protection regulations.



04. Suppliers



04. Suppliers



✧ **SELECTION POLICY**

The selection of suppliers will be carried out in accordance with the principles of transparency, objectivity and open competition. Our aim is to ensure the quality of goods and services, as well as to secure the most favourable financial terms. We pay particular attention to the technical and financial soundness of each supplier, as well as to our previous experience of working with them.

✧ **CONFIDENTIALITY**

All confidential information to which Resa has access in the course of its dealings with suppliers and subcontractors shall be treated with the utmost confidentiality and in accordance with the safeguards set out in current data protection legislation.

✧ **RELATIONS WITH SUPPLIERS**

Employees must follow internal regulations regarding the approval of suppliers and the awarding of contracts. Resa will make every effort to ensure that employees' personal interests do not significantly interfere with the aforementioned processes. We assess our suppliers to ensure compliance with standards relating to sustainability, quality, occupational safety and data protection.

04. Suppliers

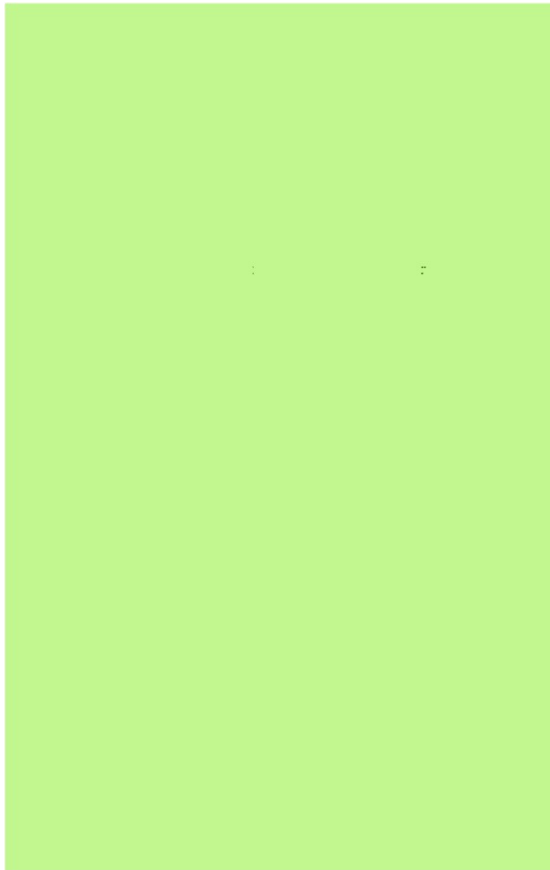


* SUSTAINABILITY AND ETHICS

We are committed to working with suppliers who act as strategic partners, collaborating closely to understand our needs and co-create the best value proposition for students. These partners must share and promote our values of sustainability, social responsibility and ethics, aligning their practices with our mission to build a better future.

Together, we seek to foster innovation and mutual growth, developing solutions that benefit both our community and the global environment

05. Shareholders



05. Shareholders

✧ TRANSPARENCY AND VALUE CREATION

"Shareholders' rights are fully protected thanks to the directors' strict compliance with all applicable regulations, particularly those relating to corporate governance.

" The directors' primary objective is to promote the creation of sustainable value for the benefit of shareholders.

The directors shall act in the best interests of the company and its strategic objectives.



06. Corporate Social Responsibility



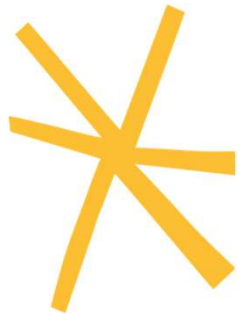
06. Corporate Social Responsibility

✧ COMMITMENT TO CORPORATE SOCIAL RESPONSIBILITY

- ✧ Resa reaffirms its commitment to the principles of corporate social responsibility, actively and voluntarily participating in social and economic development.

✧ MONITORING OF THE CODE OF ETHICS

- ✧ To ensure compliance with the code of ethics, a confidential reporting channel (<https://resa.ethic-channel.com/home>) has been set up through which any employee, supplier, customer or stakeholder may report misconduct, breaches or violations of our organisation's ethical and legal standards. The company guarantees that any report made will be taken seriously and properly investigated. Furthermore, corrective and disciplinary measures will be put in place where a breach of the organisation's ethical or legal policies is confirmed. To this end, Resa has a specialist committee comprising representatives from key departments. The Ethics Committee acts independently to ensure fair and consistent decisions, adopted by majority vote. The Compliance Director will chair the committee, casting the deciding vote in the event of a tie.



06. Corporate Social Responsibility

RESPONSIBILITIES OF THE ETHICS COMMITTEE

Resa's Ethics Committee shall assume the following responsibilities:

To interpret the code of ethics and respond to any queries that may arise regarding its application.

To receive and assess reports relating to compliance with the code, including issuing opinions in cases of disciplinary proceedings arising from breaches thereof.

Managing the communications received and, where appropriate, issuing a final decision.

Proposing to the Board of Directors any amendments, clarifications or additional rules necessary to optimise the application of the Code.

Preparing periodic reports on the degree of compliance with the Code of Ethics, making recommendations to improve its content, facilitate its understanding and ensure compliance.



APPROVAL AND EFFECTIVE DATE OF THE CODE OF ETHICS

This version of the Code of Ethics is currently in force. The Board of Directors approved the latest amendment on 17 December 2024.

“We are a key player and are committed to local university communities. Through the sustainable management of our assets, we aim to set the standard in environmental stewardship”



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