

ETHICAL CODE AND COMPLIANCE

1. INTRODUCTION

KATAPULT SPORTS AND ENTERTAINMENT is a limited liability company dedicated to marketing and advertising activities for the sports and videogames industries. Its main activities are the creation of marketing and publicity strategies, the operation of projects in sports and esports, and also the representation of both companies and individuals, in particular linked to the sport and videogames sectors.

In its desire to improve and to adhere to strict normative compliances, the current General Manager and shareholders of the company have promoted the development and implementation of a Code of Compliance, by establishing a series of ethical values and prohibiting certain behaviours, with a special attention to corruption, with the subsequent control procedures.

The current Code of Compliance lays out the principles with which the company identifies itself and is expected to be used as a referential guideline of social behaviour, with a special focus to prevent legal risks. Therefore, it does not exclude the existence of any other Code of Conduct and Ethical Code that the company may implement, being complementary, not contradictory, with the current Code of Compliance.

2. APPLICATION AND SCOPE OF THE CODE OF COMPLIANCE

This Code of Compliance is applicable to all the members of the company, managers, shareholders and employees, who must sign a declaration of commitment in which they will certify that they have read and understood the current Code of Compliance, and commit to follow what it is established in it, obligating themselves to comply with each and every specific guideline and rule specified within this Code of Compliance, and also with all the Protocols and Control measures that depend from it.

KATAPULT SPORTS AND ENTERTAINMENT, S.L. is a limited liability for profit company dedicated to the elaboration of marketing and publicity strategies, the operation of projects in the sports and esports industries, and the representation of individuals and brands linked to the sporting and videogaming sectors.

Given the existing relationship with the company, this Code of Compliance also extends to all collaborating companies that must do everything possible to comply with the indicated terms and conditions.

3. PURPOSE OF THE CODE OF COMPLIANCE

The current Code of Compliance aims to implement within the company a culture of compliance, respecting ethical, honesty and professionalism values, therefore guaranteeing the trust that clients, suppliers and third parties have placed on KATAPULT SPORTS AND ENTERTAINMENT S.L.

4. PRINCIPLES OF THE COMPANY

KATAPULT SPORTS AND ENTERTAINMENT, S.L. must always comply with the following principles:

- Management transparency.
- Participation of interested parties (clients or third parties that have a relationship with the company).
- Efficiency in the use of the resources of the organisation.
- Effectiveness in the achievement of the set goals and with full respect to the current regulations.
- Independence.
- Defence of the business interests against the individual interests.
- Service to the society as an example of good practice and the carrying out of its activity in compliance with the regulations.
- Promotion of equality.

5. THE COMPANY VALUES

The values that must prevail in the carrying out of the activity of the company and that all its members must respect are:

- Complete prohibition of any form of corruption.
- Rejection of violence, discrimination, harassment, racism, xenophobia or intolerance, advocating actions towards respect, diversity and equality among the individuals.

The company will not tolerate any conduct of harassment, moral or sexual, physical or verbal, neither demonstrations of intolerance of any kind, taking the necessary measures to prevent and eradicate them.

6. OUR COMMITMENT

The company is compelled to always act with full regulatory compliance and strict respect to the ethic and good business practice, which extends to all its members, whom have to know the ethical and legal standards, and act accordingly, know the law and make questions.

In case of any doubts, individuals must go to the immediate superior and the Compliance Committee.

7. COMMUNICATION AND REPORT CHANNEL

The company has a communication and reporting channel, through which any person related to it can put in knowledge of the company any conduct considered to be potentially infringing the company's values or that can put them in risk, as well as suggestions and queries related with the regulatory compliance.

E-mail address: compliance@katapult.es