

# Code of Ethics

NG-CTO-002

General Rules

THE VALUE  
OF COMPLIANCE



**LaLiga**

It's not football. It's LaLiga.







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## 1| Introduction and purpose

The purpose of the Code of Ethics is to lay down the values and principles that must guide the behaviour of LaLiga professionals in the performance of their work, and allow the consolidation of an integral, ethical and responsible conduct. Accordingly, this document is designed as a set of rules that define the corporate culture of LaLiga.

In this regard, although the Code of Ethics cannot and does not attempt to cover all the situations that may arise in our daily lives, it does represent a regulatory framework of reference to focus and guide our actions and decisions in the field of work.

## 2| Scope of application

The Code of Ethics binds and applies to all professionals of the LaLiga Organisation, understood as the National Professional Football League and others over which it has full or majority control, irrespective of their geographical location, including the *LaLiga Foundation*. All of them are hereinafter referred to as “LaLiga Organisation” or “LaLiga”.

Therefore, all employees and directors of the LaLiga Organisation, without exception, regardless of the type of contractual relationship, geographical location or hierarchical position occupied, including members of the Governing and Administrative Bodies, must be aware of and respect the contents of this Code of Ethics. All of them will hereinafter be referred to as “professionals subject” to the Code of Ethics.

## 3| LaLiga values

The values that define the culture of the LaLiga Organisation and which should guide the conduct of its professionals at all times, are the following:

### 3.1. Transparency

As far as LaLiga is concerned, transparency is essential to create a climate of trust and credibility, and for this reason we must be transparent in everything we do. This means speaking and acting clearly, without withholding information, making decisions and managing corporate resources with honesty and transparency towards our stakeholders.

### 3.2. Responsibility

LaLiga is committed to the responsible and sustainable development of our activity. It is therefore important to perform our work not only with the utmost professionalism and diligence, but also with an overarching vision and commitment to society. This means taking into account the benefits and consequences of our activity for society and our environment, with responsible initiatives that contribute positively to give back to society what it brings to us.



### 3.3. Teamwork

All professionals within the LaLiga Organisation form part of the same team, with the same global project, sharing a single goal that transcends personal interests. We must join forces, act with respect, solidarity and collaboration, both in victories and in difficult situations. Make the differences between people our strength, respecting the diversity of talents and skills.

### 3.4. Integrity

Our behaviour must be in line with ethics, responsibility, transparency and the utmost respect for the law. At LaLiga we believe in the noble values of sport applied not only on the field of play but also in the wider world, as a benchmark of inspiration towards a model in which the positive values associated with fair play are transferred to other areas of life.

### 3.5. Evolution

We at LaLiga are innovators constantly striving to improve. We understand that as society evolves, we must grow alongside it and work for its benefit, always seeking a more efficient solution to improve our work for LaLiga, for our own learning, for sport and for society in general.

### 3.6. Self-Improvement

Just as in sport, at LaLiga we do not give up in the face of adversity and we make every effort to overcome the obstacles that appear in our path. Accordingly, we need to work every day to be more competent, obtain greater achievements, continue to grow as professionals and support the growth of LaLiga and our sport in general. This involves making extraordinary efforts when necessary or challenging the limits and difficulties of our day-to-day life.

### 3.7. Authenticity

To be authentic is to be recognisable in the society in which we work, for the impact and the footprint we leave in the environments where we operate. For this reason, our values are transmitted through the way in which we act before the people and entities with whom we collaborate. We strive to preserve the authenticity that characterises us and identifies us both nationally and internationally.

## 4| General principles of conduct

On the basis of LaLiga values, the following are the conduct guidelines that all professionals subject to this Code of Ethics, without exception, must respect in the performance of their work, prioritizing above all compliance with the Laws, regulations, circulars of regulatory and/or supervisory bodies, as well as the internal regulations of the LaLiga Organisation that are applicable to each person's activities.

### 4.1. Information-related conduct guidelines

#### 4.1.1. Confidentiality of information

LaLiga believes that the protection of information and knowledge is essential to the performance of its business. Thus, professionals subject to this Code must not disclose any confidential information (understood as that which has not been published on the corporate website), of which they become aware as a result of the performance of their work, whether related to LaLiga or any other third party, and also:

- a. Use this information exclusively for the performance of their professional activity in the LaLiga Organisation.
- b. Not to use LaLiga's confidential information for their own benefit or the benefit of a third party.

#### 4.1.2. Integrity and veracity of information

Transparency is an essential principle of LaLiga, and therefore all professionals subject to the Code of Ethics must ensure the integrity and truthfulness of all information to be disclosed, both internally and externally, including accounting and financial reporting, which must be complete, accurate and truthful. Therefore, in no case will incorrect or inaccurate information that could induce error be knowingly provided to anyone who receives such information.

In this regard, the accounting and financial reporting of the entities that make up the LaLiga Organisation must be carried out with transparency and thoroughness, respecting in all cases applicable Law and complying with the internal control procedures of the Organisation, to ensure that they reflect the true and fair view of each and every one of the operations carried out.

#### 4.1.3. Personal data protection

All professionals subject to this Code must ensure the protection of



personal data that is processed during their work activities and, in particular, respect and compliance with the applicable internal legislation and regulations on data protection.

## **4.2. Guidelines for conduct related to corporate assets**

### **4.2.1. Responsible use of resources**

LaLiga makes available to its professionals the resources necessary for the performance of their activities. These may only be used to satisfy the professional purposes for which they are intended, efficiently and with due diligence. Therefore, professionals subject to this Code will refrain from improper or inappropriate use of such corporate resources.

### **4.2.2. Use of information and communication technologies**

In addition to the provisions of the previous section (4.2.1), in the use of computer systems and information technologies, security measures must be strictly adhered to and the rules of use established for this purpose by the Organisation must be strictly observed.

### **4.2.3. Corporate image and reputation**

LaLiga pays special attention and care to its corporate image and reputation, and all professionals subject to this Code must act with the utmost diligence to preserve the good image and reputation of LaLiga in all its professional activities by acting with loyalty and avoiding making smears, criticisms or any kind of manifestations through any verbal or written means that could compromise or damage, directly or indirectly, the image and reputation of LaLiga.

## **4.3. Conduct guidelines related to the environment and the market**

### **4.3.1. Respect for the environment**

LaLiga is committed to the rational and efficient use of the resources it manages and carries out its activity with an active and responsible commitment to the protection and preservation of the environment.

Accordingly, professionals subject to this Code must ensure the sustainable development of their activity, with maximum respect for applicable environmental regulations, which must also be encouraged in relations with our stakeholders.

#### 4.3.2. Relationship with the market

LaLiga is committed to fair and honest market competition, and does not accept deceptive, fraudulent or malicious practices or behaviour with which to obtain inappropriate advantages in the market. And, in this regard, all professionals subject to this Code, without exception, must protect the cornerstone of free competition, so as not to prevent, restrict or distort competition.

#### 4.3.3. Combating bribery, corruption, money laundering and the financing of terrorism.

LaLiga rejects any type of corruption, bribery or extortion. Accordingly, all professionals subject to the Code of Ethics, without exception, will refrain from carrying out any type of practice that could be framed within such conduct, to obtain, directly or indirectly, an undue benefit or advantage of any nature, through the use of practices that contravene the Law, the values set out in this document, or the applicable in-house regulations regarding corruption, gifts, invitations, donations, procurement and contracts.

Appropriate policies and procedures for the prevention of money laundering and terrorist financing must also be applied in trade relations.

In this regard, if there is any doubt about any type of practice and, in particular, whether or not it is banned, or how to act in a given situation, the Compliance Body of LaLiga must be consulted.

#### 4.3.4. Integrity of LaLiga's sports competitions

Professional sport plays a fundamental role in society. It has a strong social, educational, cultural and recreational dimension, and contributes greatly to economic and social cohesion. The values transmitted through sport contribute to the development of knowledge, motivation, skills and willingness to engage in personal effort. However, corruption in sport undermines these values, is a discouraging factor and seriously affects the image of professional sport.

For this reason, principles such as fair play, compliance with the rules of the game, respect for others, solidarity and discipline become essential in our sports competitions. Professionals subject to this Code must not only respect them but also promote them in order to avoid or mitigate the risk of any conduct whose purpose, through act or omission, is to deliberately and fraudulently pre-determine or alter the result of the competition.

Likewise, professionals subject to the Code of Ethics will refrain from participating in and/or placing, directly or indirectly through third



parties, any type of bet, whether promoted by public or private institutions, linked to the sports competitions of LaLiga or others in which the Clubs and Limited Liability Sports Companies (SADs) that form part of LaLiga participate.

### **4.4. Guidelines for conduct related to stakeholders**

#### **4.4.1. Relationship with clients, suppliers and partners**

LaLiga considers its clients, suppliers and partners, together with the affiliated Clubs/SADs, essential in achieving its goals of expansion and ongoing improvement. It therefore needs to establish a framework of collaboration with all of them that is presided over by trust, legality, respect, transparency and mutual benefit.

Likewise, professionals subject to the Code of Ethics and, in particular, those directly or indirectly involved in the selection or recruitment of clients, suppliers or partners, must act with impartiality, objectivity and transparency, respecting the regulations applicable to this end and avoiding any personal interference or interests with those of the LaLiga Organisation.

All clients, suppliers and partners with whom contracts are entered into must also respect, within the framework of the contractual relationship, the values and principles contained in the Third Party Code of Ethics.

#### **4.4.2. Relationship with affiliated Clubs/SADs (limited liability sports companies)**

Relations with LaLiga affiliates must be based on respect, equal treatment, transparency and mutual trust, within a framework of ongoing collaboration presided over by compliance with the Law, the Articles of Association and applicable Regulations, whether internal or external to the Organisation. And, in this regard, professionals subject to this Code will ensure compliance with the aforementioned principles in their relations with the Clubs and SAD affiliates of LaLiga.

#### **4.4.3. Relationship with authorities and Public Administrations**

Relationships with institutions, organisations and Public Administrations, both national and international, must be presided over by institutional respect, transparency and maximum collaboration, and must duly comply with their resolutions and instructions, within the legally required deadlines.

Professionals subject to the Code of Ethics must at all times maintain an attitude of respect, transparency and collaboration when facing

any requirement, inspection or supervision that may be carried out in the LaLiga Organisation, all of which must be managed by persons appropriately qualified for this purpose. Therefore, any information or documentation that is passed on to the authorities or Public Administrations must be truthful, adequate, useful and consistent.

#### **4.4.4. Relationship with professionals of LaLiga Organisation**

LaLiga eschews any manifestation of physical, psychological or moral harassment or abuse of authority, as well as any other conduct that could be offensive and/or that would infringe upon a person's individual rights. Therefore, intimidation, disrespect, or any form of physical or verbal aggression is unacceptable and will not be permitted at work. And, in this regard, any type of discrimination based on race, sex, religion, nationality, political opinion, sexual orientation or any other personal, physical or social condition of persons will also not be tolerated.

Likewise, LaLiga considers the development of its professionals to be important, and men and women must be treated equally, with equal opportunities in access to work and in professional promotion, which must be carried out with fairness, objectivity and transparency. All this while facilitating the necessary balance between professional and personal life, in order to be able to reconcile work needs with family responsibilities and personal needs in the best way possible.

#### **4.4.5. Occupational Health & Safety**

Occupational Health & Safety is a priority for LaLiga, and a safe and risk-free working environment must be ensured. Therefore, all professionals subject to this Code must know, respect and comply with the rules of occupational Health & Safety.

#### **4.4.6. Conflicts of interest**

A conflict of interest is considered to exist in situations in which the personal interest of any professional of the LaLiga Organisation, their family or third parties or entities with whom they are linked clash, interfere or may interfere, directly or indirectly, with the interests of the LaLiga Organisation.

For these purposes, the following persons will be considered as linked to the professionals of the LaLiga Organisation:

- Spouse or any other person with equivalent relation.
- Parents, children or siblings of the professional or spouse or any other person with equivalent relation.
- Spouses of the parents, children or siblings of the professional.

- Entities in which the professional or any of the persons linked to them and described above, either themselves or through a middleman:
  - a. Is a majority or significant shareholder, or,
  - b. Holds a director, board or management position which could influence the decisions of those entities.

In this regard, professionals subject to the Code of Ethics must avoid situations in which a potential conflict of interest could occur, and must always act, in the fulfilment of their responsibilities, with loyalty, honesty and defence of the interests of the LaLiga Organisation. Moreover, they must refrain from giving priority to their personal interests at the expense of those of the LaLiga Organisation and from intervening or influencing, directly or indirectly, in the taking of decisions affected by the potential conflict of interest.

#### **4.4.7. External professional, business, political or associative activities**

Professionals of the LaLiga Organisation will refrain from carrying out any other work, business, political or associative activity outside the LaLiga Organisation, whether or not remunerated, that takes place during working hours and may interfere with the performance of their duties or whose compatibility is subject to legal or contractual restrictions or conditions. Moreover, they will not use resources of the LaLiga Organisation in this context and must consult any exception to this with the Human Resources Area or the Compliance Body.

Likewise, in general, professionals subject to this Code may not use the LaLiga trademark in such activities.

The association, membership or collaboration with political parties or with any other type of entities, institutions or associations outside the LaLiga Organisation must be done in such a way that its personal nature is clear, and any involvement of the LaLiga Organisation is avoided. This can only be carried out during their free time and without the use of resources of any entity of the LaLiga Organisation.

#### **4.4.8. Intellectual and industrial property rights**

Professionals subject to the Code of Ethics must respect the intellectual and industrial property and the right of use corresponding to LaLiga, to any of the entities of its Organisation, to its affiliated Clubs/SADs or to any other third party, in relation to corporate signs, marks, logos, anagrams, projects, programs and computer systems, equipment, manuals, knowledge and, in general, any work developed or created directly or indirectly by any of the entities of the LaLiga Organisation, its affiliated Clubs/SADs or any other third party.



Likewise, professionals subject to this Code must refrain from using the image, name or trademarks of LaLiga for purposes that are private or unconnected to the LaLiga Organisation, and they will act with care not to infringe any type of image right or intellectual or industrial property right of third parties, and in particular of the affiliated Clubs/SADs or their sportsmen and sportswomen, without due authorisation.

## 5| Interpretation and consultations on the code of ethics

Any questions that may arise regarding the interpretation or application of the Code of Ethics must be referred to the Regulatory Compliance Body ([cumplimiento@laliga.es](mailto:cumplimiento@laliga.es)), which will promote the dissemination and knowledge of and compliance with this Code.

## 6| Breaches and duty to report

All professionals subject to the Code of Ethics have the duty to carry out their work activities in compliance with and respecting the provisions of this document, and must also report any breach of this Code, which is known or suspected, and cooperate in an investigation, if any, that could be initiated for clarification of the facts. Such reporting is to be instrumented through the channels provided for that purpose in the Policy on the Functioning of the Ethics Channel.

Any breach of the Code of Ethics, of any other internal regulations or of the applicable legal provisions may be considered breach of labour law that could be penalised in accordance with the applicable disciplinary regime.

## 7| Entry into force

This Code of Ethics approved by the General Assembly of LaLiga on 28th October 2019, repeals any other previous version and will remain in force from the day following its disclosure by telematic means through the internal communication channels of the LaLiga Organisation.



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