

PERSONAL DATA PROTECTION PROGRAM

QUADPACK has adopted a specific Personal Data Protection Compliance Program in order to inform all its employees and those around them of its corporate compliance policy, and to encourage lawful conduct by avoiding, and in turn investigating, any actions or omissions that might involve a breach thereof and the corresponding responsibility for this.

All employees of the Group are in any case required to act in full compliance with Data Protection laws to maintain the trust of clients, suppliers and authorities with whom QUADPACK has professional relations, and thus protect the business from any non-compliance and to maintain a good and reliable reputation in the market.

Most countries and jurisdictions have mandatory compliance legislation and if this is not the case, they have guidelines on market practices in relation to the possession and use by the company of personal data for persons to which they have access.

Specifically, the conduct required by QUADPACK of its employees is, to:

- Organise their data files (accesses, dismissals or resignations/new hires, etc.).
- Give notice, if it were necessary, of the files to the supervisory government authority, as well as the quality of the data and the consent of the affected party.
- Give notice regarding the existence of the database and, if applicable, the content thereof, to the government authority in charge of the supervision of the LOPD (*Ley Orgánica de Protección de Datos de Carácter Personal* [Personal Data Protection Law (PDPL)]).
- Maintain the applicable safety measures for the protection of the file.
- Implement technical and organisational measures for the management of the file.
- Maintain the strictest confidentiality of the data to which they have access.
- Specifically, the conduct that QUADPACK prohibits its employees from is:
 - The holding or capture of data without consent or with opposition by the affected party.
 - The transfer of data without consent.
 - The handling of personal data.
 - The disclosure or publication of data out of context.
 - The creation of user profiles based on previously obtained data.

Should there be any suspicion or evidence that an employee, client or supplier of QUADPACK is breaking Anti-Trust laws, this must be reported immediately in accordance with the "Whistleblowing Channel" annex.

Breaches of Data Protection laws may have serious consequences. Companies declared to be guilty of such non-compliance may be penalised by penal and civil sanctions, including financial sanctions and custodial sentences.