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## 1.- OBJECTIVE

This policy sets out the principles of action that reflect the commitment of ANTOLIN (hereinafter the “Company” or “Antolin”) to strict compliance with the regulations on the prevention of and the fight against fraud, corruption and bribery, in all areas of activity and in all territories where we operates, as an extension of the regulatory framework established by the Company's Code of Ethics and Conduct, in line with Principle No. 10 of the United Nations Global Compact to which we adhere and which includes the fight against corruption in all its forms, including extortion and bribery.

## 2.- SCOPE OF APPLICATION

This Policy applies to Antolin, the Group's subsidiaries where effective control is exercised, their directors and employees, and to third parties or business partners with whom there are legal relationships and who have adhered to it.

Additionally, persons acting as representatives of the Group in companies and entities not belonging to the Group, or where our Company does not have effective control, shall promote, to the extent possible, the implementation of principles and guidelines consistent with those set forth in this Policy

## 3.- OUR COMMITMENTS

ANTOLIN rejects any forms of corruption, fraud or bribery applying a zero-tolerance principle regarding any breach of this Policy.

To prevent and combat fraud, corruption, fraud and bribery, ANTOLIN sets out the following commitments:

- ✓ Zero tolerance, in any circumstances, towards corruption, extortion, the acceptance or offer of bribes, or request or receive unduly, either directly or indirectly, commissions, benefits or illicit payments, by the Company or by a third party on its behalf.
- ✓ Prohibit any attention or gift that may give rise to suspicion of corruption, or is intended to influence, directly or indirectly, the will or objectivity of outsiders to obtain any benefit or advantage through the use of unethical practices and/or contrary to applicable law.
- ✓ Undertake not to give, promise or offer, directly or indirectly, any property of value to any natural or legal person, for the purpose of obtaining undue advantage for the Company.
- ✓ Do not allow any facilitation payments to public officials or cash payments to any third party.
- ✓ Not to finance or show support or support of any other kind, directly or indirectly, to labor unions, public officials, political parties, their representatives and/or candidates, advisors, as well as any person who performs public functions or is trusted personnel of the aforementioned.
- ✓ Do not use donations, sponsorships, or any type of financial assistance to cover up improper payments. The granting of any of the above to an external entity must be carried out in an honest and transparent

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manner in accordance with the principles of our Code of Ethics and Conduct, the applicable legislation and the Sustainable Contribution Model approved by the Company.

- ✓ Pay special attention to those cases in which there are signs of lack of integrity of the persons or entities with which business is conducted, in order to ensure that ANTOLIN establishes business relationships only with qualified individuals and entities with an adequate reputation, according our Due Diligence procedures.
- ✓ Do not make any transaction with assets having any unlawful activity origin, with the adoption of internal procedures for the prevention of money laundering.
- ✓ Ensure that issues in relation to fraud, corruption and bribery are included in analytic processes in connection with the purchase of assets, stakes in companies or agreements for the joint operation or promotion of projects or operations.
- ✓ To reflect faithfully and at the appropriate time all our actions, operations and transactions in our books and records, avoiding any act tending to embezzlement or fraud. Ensuring that the information provided by the Company is complete, up to date and not misleading.
- ✓ Ensure legality, transparency and integrity in all lobbying practices, negotiations and influence strategies. Bearing in mind certain precautions and prohibitions:
  - Prohibit all types of fraudulent, collusive, coercive and obstructive practices.
  - Publish detailed information in case of participation in lobbying activities, with internal control of related budget and supervision by means of internal/external audits.
  - Avoid any conduct contrary to public International Conventions (UN, ILO, OECD, etc...),
  - Not to obtain or attempt to obtain information dishonestly, misrepresent or mislead stakeholders and/or staff of public institutions in order to obtain an undue advantage or benefit.
- ✓ Cooperate in good faith and proactively with investigations and audits.
- ✓ Promote internal training in the prevention and fight against corruption, fraud and bribery.

#### 4.- MANAGEMENT SYSTEM

Antolin has established a Compliance Management System based on the principle of transparency and due-control, focused on adherence to the commitments set out in this Policy, which may be summarized as follows:

- ✓ Implementation of a model for prevention, management and control of risks against corruption, bribery and fraud, including:
  - Procedures for approval of gifts and entertainment by an independent department. In this regard, the provisions given in our Gifts and Hospitality Policy shall be followed, with the Compliance function acting as guarantor and final approver.
  - Risk assessment of the Company's vulnerable areas and establishment of internal controls, including the financial and accounting areas, to prevent and, where appropriate, detect and eradicate irregular practices related to fraud, corruption and bribery, in order to mitigate these risks;

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- Supervision and verification through internal and external auditing processes, the latter developed by an independent and specialized organization.
  - Direct access and reporting to the Compliance department in the event of any situation or practice that affects this Policy, through confidential information systems, as well as coordination with the business units through internal notification systems.
- ✓ Establishment of mechanisms to guarantee compliance with the internal and external regulations applicable by company employees and, as the case may be, by any third parties related to them. These mechanisms are as follows:
- The Crime Prevention Model or Corporate Defense Programme, as a structured and organic prevention and control system aimed at reducing the risk of crime being perpetrated, including financial crimes.
  - The Internal Control System over Financial Information, as a mechanism to prevent and control internal financial reporting fraud.
- ✓ Responsibility for Compliance in general is the duty of all members of the Company in their own particular areas and with a focus on risk approach and, specifically, according to the internal structure of roles and responsibilities established by the Company.

**5.- COMMUNICATION OF NON-COMPLIANCE EVENTS**

If the Employees have evidence, doubts or suspicions regarding any non-compliance or violation of this Policy, they must immediately report to the Compliance Office. For this purpose, Antolin has internal channels developed for the communication of possible irregularities, including the Compliance Department itself (compliance@antolin.com) or the Transparency Channel ([Whistleblowing Line Antolin](#)).

ANTOLIN will not tolerate any retaliation against anyone who, in good faith, communicates facts that could constitute a breach of this Policy.

Employees who violate these provisions will be subject to the corresponding disciplinary measures, with all the rigor allowed by current regulations.

Likewise, ANTOLIN will reserve the right to adopt the measures it deems appropriate against Business Partners that violate this Policy.

Responsibility in the area of anticorruption is the duty of all members of the Company in their own particular areas, and specifically to representatives of senior management, who are responsible for its adequate management.

APPROVED - MANAGEMENT	
	Approved by Board of Directors on 21 <sup>th</sup> of December 2022
DATE: December, 21 <sup>th</sup> 2022	SIGNATURE: