

ENTITY:

ANTOLIN

COUNTRY:

ALL

1.- OBJECTIVE

The purpose of this Policy is to define and establish guidelines to prevent any employee, subcontractor or a third party representing or maintaining commercial relations with ANTOLIN from engaging in anti-competitive conduct, guaranteeing a fair and effective defense of competition in the markets and territories where we operate, promoting the establishment of a culture of compliance, safeguarding our reputation and defending the values incorporated in our Code of Ethics and Conduct.

2.- SCOPE OF APPLICATION

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

Additionally, persons acting as representatives of ANTOLIN in companies and entities not belonging to ANTOLIN, 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

In order to preserve the proper competitive functioning of the market and to foster a business ethics culture which respects the principles of free competition, integrity and transparency, ANTOLIN establishes the following commitment:

- ✓ Comply with applicable national and international regulations in the development of our professional activity, avoiding any conduct that may be considered restrictive of competition.
- ✓ Not to engage in conduct that restricts or limits free competition.
- ✓ Not to enter into agreements, decisions or practices considered anticompetitive with our competitors and to interact with them only when there is an objective reason to justify it and provided that this does not raise doubts from the point of view of competition law.
- ✓ Promote and support open competition in our relationships with customers, competitors, business partners and suppliers, never addressing with them issues that may result in anti-competitive covenants or practices, including, but not limited to, the following:
 - fix-pricing, margins, volumes or payment terms,
 - manipulating bids (bid rigging), offers or collusive agreements,
 - to make improper market-sharing (allocation of customers, suppliers, territories)
- ✓ Not to abuse a dominant position in the domestic market or in a substantial part of it, nor to participate in any business network, association or affiliation that restricts, monopolizes or attempts to monopolize any market, or that does not allow the entry of new competitors.

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- ✓ Not to produce misleading advertising or transmit or omit information that does not conform to the reality of our goods or services and/or that may mislead, as well as to make statements about the activity, products or services of a competitor that may undermine its reputation in the market.
- ✓ Not to participate in boycotts or acts of unfair competition (price discrimination, sale of products and services below cost price to render competition impossible -dumping-).
- ✓ Not to discuss strategies or plans to get business or eliminate business or products from an specific company.
- ✓ Treat our competitively sensitive information confidentially and respect the trade secrets of third parties and any other information of a sensitive nature, avoiding any industrial espionage and complying with the legally established requirements, as well as the rules of conduct set forth in our Information Security and Data Protection Policy.
- ✓ Provide our professionals with the appropriate tools so that can carry out their activities avoiding situations of exposure to anti-competitive risks and take up the necessary measures to minimize the degree of exposure to potentially conflictive situations.
- ✓ Establish an antitrust risk management and control model based on the due-control principle that includes:
 - Approval procedures for contract prices and contract conditions with multiple and independent authorization system;
 - Risk assessment of vulnerability areas within the Company;
 - Supervision and verification through internal and external audits, 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 affecting this Policy, as well as coordination with the business units through an internal notification system.
- ✓ Incorporate specialized training for our professionals in the duties imposed by the regulation, aimed at compliance with the commitments described in this Policy and the prevention of anti-competitive behavior.
- ✓ Collaborate with maximum transparency with the national, community and international competition authorities in any type of antitrust case.
- ✓ Ensure legality, transparency and integrity in all practices, negotiations and strategies where influence can be exercised.
- ✓ Provide the Compliance Function with sufficient resources to ensure the effectiveness of this Policy
- ✓ Collaborate in good faith and proactively with the investigations and audits that are carried out, as well as the duty to inform the Ethics and Compliance Office of any suspected or actual breach of our ethical principles or applicable regulations.

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4.- 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 Division. For this purpose, ANTOLIN has internal channels developed for the communication of possible irregularities, including the Compliance Department itself (compliance@antolin.com) or the Whistleblowing 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 antitrust 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.