

## 1.- OBJECTIVE

The purpose of the Compliance Policy, that develops the Code of Ethics & Conduct of ANTOLIN (hereinafter “Antolin” or the “Company”, indistinctly) and forms an integral part of the Compliance Management System, is to define the general principles that this System reports, as well as the main commitments that are assumed by the Company with respect to compliance and should guide its conduct in all its areas of activity and in achieving its business objectives.

## 2.- COMPLIANCE OBJECTIVES

The extensive set of activities developed by ANTOLIN, the different geographical areas in which their operations are performed and the ongoing relationship with third parties, makes the Company subject to a variety of regulations in different jurisdictions as well as exposing the Company to a wide range of risks.

ANTOLIN’s Code of Ethics & Conduct, top of the internal regulation system of the Group, establishes respect for the current law, human rights and ethical values, as a primary standard of conduct governing its operations.

In line with said principle, together with the values of the Company, ANTOLIN has put a Compliance Management System into place.

The main objectives of ANTOLIN with respect to Compliance are:

- a) Promote a Compliance culture and zero tolerance towards non-compliance.
- b) Ensure, through prevention, detection, supervision and response activities, that the Organization complies, within the scope of its activities and operations, with all relevant regulations, both external regulations as well as the internal regulation system (the foregoing, as whole, hereinafter “Applicable Regulation”), thereby avoiding any possible sanctions, economic losses and damage to their reputation.

## 3.- 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 and partners with whom there are legal relationships and who have adhered to it.

For those affiliate companies and entities that are not effectively controlled by ANTOLIN and for which the Group is not responsible for their operations and/or management, the Group will promote, through their representatives the implementation of principles and guidelines consistent with those set forth in this Policy.

In addition, ANTOLIN shall promote and encourage their contractors, suppliers, collaborators and, in general, stakeholders, to adopt conduct standards consistent with those defined in this Policy, and shall act with necessary diligence when selecting its counterparties and adopting measures to maintain relationships with only those that are aligned with the Compliance objectives of ANTOLIN.

ANTOLIN can request its Counterparties to formalize their commitment to the conduct standards and Compliance objectives that are set out in this Policy.

#### 4.- OUR COMMITMENTS

The respect shown towards and fulfilment of the Applicable Regulation forms the base on which the conduct of ANTOLIN in all its activity areas are withheld, and on said base the main commitments towards compliance are configured, namely:

- ✓ Promote awareness and respect towards the Applicable Regulation, enforcing the law applicable, and prohibiting the commission of criminal acts, with the unequivocal support, commitment and leadership of the Administrators and Senior Management of the Company.
- ✓ Develop and implement Compliance Management System that facilitates the identification, assessment and management of non-compliance and criminal issues that may arise from operations, products and services of the Company, as well as identify controls and integrate them into the Company's processes, through internal policies, management processes and operating procedures, to minimize the Company's exposure to compliance risks and meet all compliance obligations.
- ✓ Disclose a Policy that is congruent with the aims of the Company and its business objectives.
- ✓ Provide an appropriate framework for the definition, revision and achievement of the objectives of the Compliance System.
- ✓ Encourage communication and impose the obligation to report any suspicious act or conduct that does not comply with the good practice and compliance standards of ANTOLIN, enabling for this purpose the appropriate whistle-blowing channel that guarantees its independence and confidentiality, and protects the Informer from any retaliation as well as the rights of the people under investigation
- ✓ Expose the consequences of not meeting the System's own requirements and/or derivatives, with the application of disciplinary or corrective actions or sanctions permitted by current labour laws where required.
- ✓ Provide training and assessment to all members of staff on topics related to compliance, as well as, where appropriate, to third parties who have a working relationship with ANTOLIN.
- ✓ Establish a continuous improvement management, assessing on a regular basis the design and performance of the Compliance Management System, implementing as many changes and improvement opportunities that are identified.
- ✓ Define the authority and independence of the person in charge of the Compliance Management System when different from the Governing Body.

### 5.- 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:

- ✓ Responsibility for Compliance in general is the duty of all members of the Company in their own areas and with a focus on risk approach and, specifically, according to the internal structure of roles and responsibilities established by the Company.
- ✓ It reflects the commitments taken on by the Company in its regulations, constituted by the policies, regulations, procedures and controls that allow and facilitate their effective implementation.
- ✓ The existence of safeguard mechanisms, such as the Compliance Function, whose responsibilities include ensuring awareness, understanding and fulfilment of the commitments made by the Company that are contained in its policies, regulations and procedures.
- ✓ The establishment of a procedure for managing notifications and consultations concerning irregularities or instances of non-compliance with the Code of Ethics & Conduct and the regulations and policies that inspire or implement it and whose responsibilities and operation are described in the ANTOLIN's Code of Ethic & Conduct. For this purpose, the Company 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](#)).

In case of any inconsistency between the English and the Spanish versions of this Compliance Policy, the version in Spanish language shall prevail.

APPROVED - MANAGEMENT	
	Approved by the Board of Directors on 21th Dec 2022.
DATE: December, 21th 2022	SIGNATURE: