



Anti-Corruption Policy



P-L.01 Anti-Corruption Policy

1. INTRODUCTION 3

2. SCOPE OF APPLICATION 3

3. POLICY SUPERVISORY BODY 4

4. GENERAL ISSUES TO BE TAKEN INTO ACCOUNT IN THE PREVENTION OF CORRUPTION 4

5. RULES OF CONDUCT IN RELATION TO PUBLIC AUTHORITIES OR PUBLIC OFFICIALS 7

6. RULES OF CONDUCT REGARDING THE PRIVATE SECTOR 9

7. RULES OF CONDUCT REGARDING POLITICAL PARTIES 10

8. RULES OF CONDUCT IN RELATION TO DONATIONS, SPONSORSHIPS AND OTHER NOT-FOR-PROFIT CONTRIBUTIONS..... 11

9. RULES OF CONDUCT REGARDING ADVISORS, AGENTS AND INTERMEDIARIES CONTRACTED BY THE COMPANIES IN CONNECTION WITH TRANSACTIONS OR ACTIONS INVOLVING PUBLIC SECTOR ENTITIES.....11

10. TRAINING AND DISSEMINATION..... 14

11. WHISTLEBLOWING CHANNEL AND IMPOSITION OF SANCTIONS 15

12. MONITORING AND SUPERVISION OF THE POLICY 15

13. APPROVAL AND ENTRY INTO FORCE OF THE POLICY..... 15



1. Introduction

The Atrys Group¹ is governed by the basic principles of integrity and professional rigour, principles that inspire all the actions and behaviour that the Group and its members carry out on a daily basis within the framework of their professional activity.

In line with these principles, the Atrys Group is firmly committed to the fight against all acts of corruption, both in the public and private sectors, especially as the healthcare sector in which the Group carries out most of its activities is particularly sensitive to this risk (as pointed out by the European Commission in its report to the Council and the European Parliament on the fight against corruption in the European Union of 3 February 2014).

The risk of corruption is not only a widespread social scourge that jeopardises confidence in the market and the security of business transactions, but it is also punishable as a crime in most countries and its prevention is an objective set by the international community. This is reflected, for example, in the Convention on Combating Bribery of Foreign Public Officials in International Business Transactions of the Organisation for Economic Co-operation and Development (OECD) of 21 November 1997 and the United Nations Convention against Corruption of 31 October 2003.

Atrys Group's 'zero tolerance' policy towards corruption requires the establishment and implementation of a series of specific rules and controls for the prevention of situations and conduct that could lead to the commission of public and private corruption offences.

Thus, the purpose of this Anti-Corruption Policy (**the 'Anti-Corruption Policy' or the 'Policy'**) is to establish the necessary rules, guidelines and controls for the prevention of corruption, complementing and developing the provisions of the Code of Conduct and the Crime Prevention Programme of the Group companies mentioned in section 2 below. This is notwithstanding the adoption of additional controls arising from more stringent local regulations or obligations in this area that may be applicable.

2. Scope of application

This Policy, as well as the rules of conduct contained herein, must be complied with by all persons who make up the companies of the Atrys Group indicated below, including its directors or administrators, managers, employees, as well as those natural persons who collaborate with said companies in the performance of their activities (hereinafter, all of them will be referred to as '**Professionals**').

¹ The terms '**Atrys Group**' or '**Group**' encompass Atrys Health, S.A. and all its subsidiaries.



In particular, for the strict purposes of the provisions of this Policy, Professionals include those persons who, within the framework of a contractual relationship of a commercial nature, perform functions or provide services that are part of the business activity of the companies (e.g. medical professionals).

The Atrys Group companies to which this Policy applies are the following:

- ☒ Atrys Health, S.A.
- ☒ Llebalust Patología, S.L.U.
- ☒ Institut Mèdic D'Oncoradioterapia, S.L.U.
- ☒ EDiagnostic Clínica Virtual de Especialidades Mèdicas, S.L.U.
- ☒ SIMM Molecular, S.L.U.
- ☒ Bienzobas Salud, S.L.U.
- ☒ Initia Oncología, S.L.U.
- ☒ Initia Research, S.L.

The above entities are hereinafter collectively referred to as the '**Companies**'.

3. Policy supervisory body

The body in charge of supervising the design, implementation and compliance with the Anti-Corruption Policy shall be the Compliance Department (hereinafter, the '**Department**' or the '**Compliance Department**') in accordance with the provisions of section 8 of the Companies' Crime Prevention Programme.

4. General issues to be taken into account in the prevention of corruption

Before establishing companies' internal rules for the prevention of corruption, it is important to highlight some issues in this area:

- Understood in a broad sense, corruption includes both what in the Spanish Criminal Code is called 'bribery' (bribery of officials), and 'influence peddling', and both corruption in the public sector (bribery) and in the private sector (so-called 'corruption in business'), as well as illegal financing of political parties.
- In bribery, the offence is committed by both the official who allows himself/herself to be corrupted and the private individual who corrupts. The same applies to corruption between private individuals or in business, which is regulated in Articles 286 bis to 286 quater of the Criminal Code.
- Bribery is carried out by means of what the Penal Code calls a 'gift'. A gift can be anything that has economic value: money, gifts, goods or assets of any kind, provision of services, employment of family members, contracts,



travel, invitations to events, etc. The same applies to private-to-private corruption.

- It is a bribery offence whether the gift is offered or given directly to the official or whether it is offered or given to a relative, to a person indicated by the official or to an interposed person or entity (e.g., a company formed by relatives, friends or front men of the official). Similarly, in the offence of corruption in business, the benefit or advantage may be offered or given through an intermediary.
- For the purposes of the offence of bribery, the concept of public official is broader than the concept we usually use in ordinary language. 'Public officials' does not only refer to officials of public administrations. It also refers to Ministers and Regional Councillors, Deputies and Senators, Regional Deputies, City Councillors, public officials, labour personnel working in public administrations and, in general, any person involved in the exercise of public functions, as well as those who exercise public functions in the European Union, in any other foreign country, or in a public international organisation. Employees and managers of public enterprises are also considered to be public officials for the purposes of these offences. Thus, for the purposes of this Policy, the terms 'public official' or 'public authority' encompass the persons mentioned above.
- The offence of bribery exists when the purpose of the bribe or gift is to make the public official carry out an illegal act (or fail to do what he or she is obliged to do). But it is also an offence when the purpose of the bribe or gift is a lawful act. It is also an offence when the bribe or gift takes place after the official's act and as a reward for that act (whether legal or illegal).
- There may even be an offence of bribery when the gift is offered or given to the public official in exchange for nothing, simply in consideration of his or her position or function. In this case, it is generally understood that gifts that are simple courtesies or that are in accordance with social, customary and polite usage are not criminal. But the Penal Code does not establish any limits: it does not define courtesy gifts or social uses (in fact, it does not even mention them) and it does not set any economic threshold above which the gift is considered unlawful.
- The following excuses are not valid in corruption offences 'everybody does it' or 'if you don't pay it is impossible to get a contract'. It is also irrelevant whether the initiative comes from the public official or the private individual. And the act of corruption that is carried out because it involves extortion by the public official is equally criminal.
- The Penal Code imposes prison sentences on persons, both public officials and private individuals, who engage in acts of corruption. The same is true of the laws of most countries. Corruption in international transactions is nowadays considered particularly serious and is rigorously prosecuted in many countries. Of particular relevance here is the US Foreign Corrupt



Practices Act. In international corruption, the laws of many Western countries apply to acts carried out abroad (e.g., the Spanish Criminal Code or the US Foreign Corrupt Practices Act).

- Acts of corruption can result in severe penalties or sanctions being imposed on the companies involved. In many countries (including Spain) the company itself can be convicted of bribery or corruption if one of its members offers or gives a bribe or accepts a bribe request. The penalties or sanctions for companies can consist of very high fines, as well as other types of penalties such as suspension of activities, closure of establishments or disqualification from bidding for public contracts with the administration. Such disqualifications are also imposed by international organisations that promote or finance projects in different countries (e.g., the World Bank). This means that an act of corruption, in addition to the possibility of imprisonment for the employee or manager involved, can have very serious consequences for the company in which he or she works, which may even jeopardise its survival.
- Criminal liability for the act of corruption still applies if it is a third party hired by the company (an advisor, consultant, intermediary, etc.) who offers or delivers the bribe or gift. There is no barrier or firewall for the fact that the act of corruption is carried out directly by that third party contracted by the company. In such cases, both the company itself and the managers or employees involved in the project may incur criminal liability, even if they have not made any direct delivery to the public official or even if they have had no dealings with the public official. For this reason, special care should be taken in the selection of intermediaries, advisors, etc., to be hired for such transactions.
- Corruption offences cannot be committed by mere negligence. They are what in Spanish criminal law are known as intentional crimes. However, when assessing whether or not there is malice (as opposed to mere negligence, which is not a criminal offence in this area), the courts in most countries (including Spain) apply a doctrine called 'deliberate ignorance', which means that if a person has sufficient reason to think that there is going to be an act of corruption and, despite this, prefers to look the other way and do nothing to prevent it, then they may be criminally liable as if they had known for certain that this act of corruption was going to take place. In other words, if a person deliberately places themselves in the position of ignorance, of looking the other way, despite having good reason to suspect what is happening, they may end up incurring criminal liability for a fraudulent offence.
- The crime of corruption in business consists of promising, offering or granting benefits or advantages, directly or through third parties, to administrators, managers, employees or collaborators of other commercial companies or organisations of any kind, in order to be unduly favoured in contracting, procurement or sales processes. This conduct is criminal



whether the benefit or advantage is offered or given on one's own initiative or at the request of a manager, director, collaborator or employee of the other company. Obviously, the offence is also committed by the employee or manager who accepts or requests the benefit or advantage in exchange for unduly favouring the procurement of goods or services.

- Therefore, corruption does not cease to exist because the bribe or kickback is offered or given to an employee or manager of a private company. It is a different type of corruption, but equally criminal. Kickbacks to employees or managers of a company in exchange for favouring a supplier are not only immoral; they are now also a crime.
- The offence of influence peddling consists of influencing a public official by taking advantage of a previous personal relationship with him/her or another public official in order to obtain a beneficial decision for oneself or for a third party. It is also an offence to solicit or accept any form of remuneration or reward in exchange for exercising undue influence over a public official.
- The crime of illegal financing of political parties exists when donations or contributions are received or given to a political party, federation, coalition or grouping of voters in violation of the provisions of Organic Law 8/2007, of 4 July, on the financing of political parties, as well as participation in structures or organisations, whatever their nature, whose purpose is the financing of political parties, federations, coalitions or groupings of voters, outside the provisions of the law.

5. Rules of conduct in relation to public authorities or public officials

5.1 Prohibited conducts

- 5.1.1 It is prohibited to offer or give to a public authority, official or public employee, whether national or foreign, directly or through intermediaries or persons linked to them:
- (i) A gift, remuneration, favour or service, regardless of its economic value, conditioned, explicitly or implicitly, on such authority, official or public employee taking a decision for the benefit of the Companies or a third party, or to unjustifiably omit or delay an act proper to the duties inherent to his or her position, for the benefit of the Companies or a third party.
 - (ii) A gift, remuneration, favour or service, regardless of its economic value, which constitutes, directly or indirectly, a reward for a decision previously taken by such public authority, official or employee for the benefit of the Companies or of a third party.



- (iii) A gift, remuneration, favour or service, regardless of its economic value, which is conditional upon such public authority, official or employee influencing another public official or employee of such government with a view to obtaining a decision for the benefit of the Companies or a third party.
- (iv) A gift, remuneration, favour or service which, in view of its economic value, exceptionalness, exclusivity or any other circumstance, goes beyond the usual social and courtesy customs.

5.1.2 It is also forbidden to accept a request for gifts, remuneration, favours or services mentioned in the previous points from an authority, public official or employee.

5.1.3 It is forbidden to exert influence on a public authority, official or employee:

- (i) by taking advantage of the existence of a previous personal relationship (of kinship, friendship, mutual business, etc.) with that particular authority, public official or public employee or with another authority, public official or public employee; and
- (ii) with the purpose of obtaining a decision beneficial to the interests of the Companies or of a third party.

5.1.4 It is prohibited to solicit, on behalf of oneself or the Companies, from any third party a remuneration, payment or reward of any kind or amount in exchange for improperly influencing an authority, official or public employee in the terms described in point 5.1.3.

5.2 Permitted conducts subject to the authorisation of the Compliance Department

5.2.1. The prior authorisation of the Compliance Department shall be sought for the giving or receiving of gifts, invitations or corporate hospitality to an authority, official or public employee or persons related thereto², provided that these are within the usual social and courtesy customs. Such prior authorisation shall also be required when the Company's Professionals are the recipients of such gifts or hospitality. Communications made to the Compliance Department to request this authorisation must indicate (i) the type of attention or gift; (ii) the identity of the persons making and receiving them; and (iii) the reason for which they are made.

5.2.2. In the case of invitations to lunches or dinners to a public authority, public official or public employee or persons related to them, these shall be moderate and in accordance with social, customary and courtesy customs. When such

² For the purposes of this Policy, persons related to the employee or public authority are considered to be: (i) the spouse or persons in a similar relationship of affection; (ii) the ascendants, descendants and siblings of the employee or public authority; and (iii) the spouses or persons in a similar relationship of affection of the ascendants, descendants and siblings of a public official or authority.



transactions exceed 100 euro per person, they shall require prior authorisation from the Compliance Department.

- 5.2.3. The Compliance Department may request such additional information as it deems appropriate from the person making the request for authorisation in order to assess whether the service falls within the usual social and courtesy customs. Management may also establish the measures it deems appropriate to mitigate the risk associated with the care provided or received by the Professionals.
- 5.2.4. The notification to the Compliance Department provided for in this section shall be made by sending an e-mail to the following address: cumplimiento@atryshealth.com.
- 5.2.5. The Compliance Department shall establish and maintain a register of the communications and authorisations provided for in this section (5).

6. Rules of conduct regarding the private sector

6.1 Prohibited conducts

- 6.1.1. It is forbidden to promise, offer or grant, directly or through a third party, to an officer, director, employee or collaborator of any company or private entity with which the Companies have relations, gifts, remuneration, favours or services as consideration for unduly favouring the Companies in the acquisition or sale of products or the contracting of services.
- 6.1.2 It is forbidden to offer or give gifts to customers, suppliers or collaborators of the Companies or other third parties with whom the Companies maintain relations when such gifts consist of money or its equivalent in any form (cheques, transfers, gift cards, etc.). The remuneration at market price of speakers at conferences, seminars, lectures or working groups organised by the companies, where appropriate, shall not be considered gifts, due to their nature of provision of services.
- 6.1.3 It is forbidden to request from customers, suppliers or collaborators of the Companies, as well as from other third parties with whom the Companies maintain a relationship, gifts, benefits or advantages of any nature that are not justified for oneself or for a third party.
- 6.1.4 It is forbidden to accept gifts from customers, suppliers or collaborators of the Companies or other third parties with whom the Companies maintain relations when such gifts consist of money or equivalent in any form (cheques, transfers, gift cards, etc.). The remuneration of speakers at conferences, seminars, lectures or working groups in which the Company's Professionals participate is not considered a gift, due to its nature as a provision of services.



6.2 Permitted actions subject to authorization by the Compliance Department

- 6.2.1 The prior authorisation of the Compliance Department shall be sought for the delivery or receipt of gifts, invitations or corporate hospitality to an executive, director, employee or collaborator of any company or private entity with which the Companies have relations or to persons related to them³, provided that these are within the usual social and courtesy customs. Such prior authorisation shall also be required when Company Professionals are the recipients of such gifts or hospitality from such third parties. Communications made to the Compliance Department to request this authorisation must indicate (i) the type of attention or gift; (ii) the identity of the persons making and receiving them; and (iii) the reason for which they are made.
- 6.2.2 As regards to invitations to lunches or dinners for an executive, director, employee or collaborator of any company or private entity with which the Companies have relations, these shall be moderate and in keeping with social, customary and courtesy customs. When such invitations exceed 100 euro per person, they must be reported to the Compliance Department either before or after they are made.
- 6.2.3 The Compliance Department may request such additional information as it deems appropriate from the person making the request for authorisation or the corresponding communication in order to assess whether the service falls within the usual social and courtesy customs. Management may also establish the measures it deems appropriate to mitigate the risk associated with the care provided or received by the Professionals.
- 6.2.4 The notification to the Compliance Department provided for in this section shall be made by sending an e-mail to the following address: cumplimiento@atryshealth.com.
- 6.2.5 The Compliance Department shall establish and maintain a register of the communications and authorisations provided for in this section (6).

7. Rules of conduct regarding political parties

- 7.1. The Atrys Group shall refrain from any impermissible activity in connection with the financing of political parties. In particular, giving donations, gifts, hospitality or contributions in any form or amount (including sponsorship agreements) to political parties, federations, coalitions, constituencies or any other organisation

³ For the purposes of this Policy, related persons are considered to be (i) spouses or persons in a similar relationship; (ii) ascendants, descendants and siblings; and (iii) spouses or persons in a similar relationship to ascendants, descendants and siblings.



of a political nature made on behalf of the Companies or by their Professionals in the exercise of their duties is prohibited.

- 7.2. Likewise, it is prohibited to make donations, gifts, hospitality or contributions, regardless of their type and amount, to foundations and entities linked to political parties or dependent on them under the conditions set out in the seventh additional provision of Organic Law 8/2007, of 4 July, on the Financing of Political Parties.

8. Rules of conduct in relation to donations, sponsorships and other not-for-profit contributions

- 8.1. The Companies may only make donations or sponsorships to foundations, non-governmental non-profit organisations with a recognised track record, as well as to organisations and entities belonging to the public sector that can accredit the implementation of the social action that is the object of the contribution.
- 8.2. Donations, sponsorships and other contributions must be for the purpose of financing a specific programme or action that can be documented and accredited by the beneficiary entity.
- 8.3. All donations made by the Companies to foundations or non-governmental non-profit organisations, or organisations belonging to the public sector, as well as other contributions or sponsorship agreements entered into with these entities, shall be reported to the Compliance Department for authorisation.
- 8.4. The Compliance Department shall create and maintain a register of the donations, sponsorships and sponsorship agreements entered into by the Companies, indicating the beneficiary entity, the purpose of the contribution, the specific action financed, and the amount contributed.

9. Rules of conduct regarding advisors, agents and intermediaries contracted by the Companies in connection with transactions or actions involving public sector entities

- 9.1 Corruption risks may arise from the conduct of third parties with whom the Companies have contracted (e.g., intermediaries, agents, advisors, consultants or business partners), especially if these third parties intervene on behalf of the Companies in public contracts for which the Companies are a potential successful bidder. Therefore, contracts and transactions entered into by companies with such third parties in connection with transactions in which a public administration,



in any form (public bodies, public companies, etc.) will be involved in any way, must be subject to a due diligence procedure⁴.

9.2 In particular, the due diligence measures to be applied are as follows:

- (i) the necessary documentation shall be collected to verify the identity of the third party;
- (ii) the necessary documentation will be obtained to accredit the activity of the third party, such as its annual accounts, information on its website, etc.;
- (iii) the reputation and experience of the third party in the market and in brokerage or advisory contracts similar to the one entered into with the Companies shall be accredited;
- (iv) the ownership and address of the bank account into which the services of the third party are to be paid shall be accredited, rejecting accounts opened in the name of different persons or accounts opened in entities of dubious reputation or located in tax havens;
- (v) before contracting the third party, and in any case before paying them any amount for their services, information must be obtained on the specific persons responsible for carrying out the work, their collaborators and whether they have any relationship with public authorities or public officials (or persons close to them);
- (vi) the amount of the third party's remuneration and the manner in which it is calculated shall be analysed, which shall be consistent with market practice and, if possible, shall be compared with offers from other advisors or intermediaries;
- (vii) all the above information and documentation shall be summarised and, where appropriate, annexed to a report to be drawn up by the internal person or body requesting the engagement of the third party in accordance with the internal procedures of the Companies, this report shall accompany the engagement proposal prepared by the corresponding business area and sent to the Compliance Department.
- (viii) The Compliance Department shall take such actions as it deems appropriate to validate the information contained in the report submitted by the business area proposing the contracting or to complete it (including searches in specialised databases to identify the possible existence of adverse news, the involvement of the third party in criminal or administrative proceedings, the existence of sanctions against the third party, among other aspects that the Department may consider relevant in each case).

⁴ Advisors providing strictly legal or financial services are excluded from the application of the third party assessment procedure described in this section (9).



- (ix) Following point (viii) above, the Compliance Department shall assess the level of risk associated with the third party by deciding (a) whether to authorise the registration or continuation of the relationship with the third party; (b) whether to authorise the registration or continuation of the relationship with the third party once the third party has adopted the corrective actions determined by the Department to reduce the level of corruption risk associated with the third party; or (c) if the third party is not allowed to enter into or continue the relationship with the third party because of a high level of corruption risk that cannot be mitigated by corrective actions.
- (x) The third party may not be contracted until the Compliance Department has issued its favourable report on the contracting referred to in point (ix) above, which may make authorisation of the contracting conditional on the implementation of the risk mitigating actions deemed appropriate.

9.3 In the process of assessing the third party set out in point 9.2 above, particular attention should be paid to cases where any of the following circumstances apply:

- (i) the third party has been recommended by a public official involved in or related to the transaction for which the third party is engaged;
- (ii) searches in specialised databases, on internet search engines or on the website yield negative results related to the reputation of the third party;
- (iii) the third party has a business relationship or a direct or indirect personal relationship with a public authority, official or employee or with one of their family members;
- (iv) the third party requests that the payment be made to third parties, in cash or to accounts located in tax havens;
- (v) the third party lacks experience in performing the services for which they are contracted;
- (vi) the business area has raised the need to establish a relationship with the third party at a time close to the date when an authority is due to issue a decision;
- (vii) the third party requests charitable donations and contributions to political parties;
- (viii) the remuneration requested by the third party does not appear to be proportionate to the scope and nature of the service to be provided by the third party;
- (ix) the third party refuses or is reluctant to cooperate in the due diligence procedure referred to in point 9.2 above;



- (x) the third party establishes suspicious and/or unusual payment terms (including but not limited to: payment in cash, payment to third parties outside the contractual relationship, payment in advance of the provision of the service or payment to a bank account located in one of the countries included in the EU list of non-cooperative countries and territories for tax purposes); or
- (xi) the transaction in relation to which the third party is contracted takes place in a high-risk country, defined as a country with a score of less than 40 in the Corruption Perceptions Index published annually by Transparency International.

- 9.4 The Compliance Department shall create and maintain a register of the agents, intermediaries and advisors contracted by the Companies in relation to transactions involving public administrations, which shall include the reports drawn up in respect of them as well as the authorisations or rejections granted for their contracting.
- 9.5 As far as possible, the third parties contracted shall be of recognised prestige, have proven experience in the sector and have anti-corruption protocols and controls in place.
- 9.6 The contracting of the third party must be made in writing and all of them shall promote the inclusion of ethical and anti-corruption clauses in which the third party declares to be aware of the content of this Policy and undertakes to comply with the provisions of the same, expressly acknowledging that non-compliance will be considered as a cause for termination of the contractual relationship.
- 9.7 It is prohibited to pay third parties in cash, except for the payment or advance payment of minor travel expenses, subject to prior authorisation by the Compliance Department.
- 9.8 Before proceeding to pay for the services provided by the third party, the unit that proposed the contracting thereof must provide the Administration Department, with a copy to the Compliance Department, with the documentation and information supporting the actual provision of the services.
- 9.9 The evaluation process foreseen in 9.2 above will be carried out again when (i) a decision is to be taken on the renewal of their contract; or (ii) when there is any indication of corruption or any other unethical business behaviour.

10. Training and dissemination

- 10.1 This Policy shall be included among the training matters linked to the criminal risk prevention training plan provided for in section 11.3 of the Companies' Crime Prevention Programme.



10.2 Furthermore, in addition to such training actions, the following channels shall be used in all cases to disseminate the contents of this Policy:

- (i) the delivery of a copy of the Anti-Corruption Policy when the Professionals join;
- (ii) the Atrys Group Home Page, which shall keep the Anti-Corruption Policy published.

11 Whistleblowing channel and imposition of sanctions

- 11.1 Professionals who become aware of any circumstance that may constitute a breach of this Policy are obliged to report it as soon as possible through any of the reporting channels provided for in section 2 of the Companies' Internal Information System Policy.
- 11.2 In addition, failure to comply with the Policy may give rise to the imposition of sanctions or the appropriate actions depending on the relationship that the offender has with the Companies in accordance with the provisions of section 10 of the Companies' Crime Prevention Programme.

12 Monitoring and supervision of the policy

- 12.1 Compliance with this Policy will be one of the points analysed in the report to be issued annually by the Compliance Department on the evaluation of the Crime Prevention Programme (see section 8.6 of the Programme).
- 12.2 Likewise, within the framework of its annual work plan, the Group's Internal Audit Department will audit the Policy as part of its independent supervisory functions. In this respect, each year the Audit Department, in collaboration with the Compliance Department, will select the aspects of the Policy that will be subject to verification, carrying out such tests and reviews as the Audit Department deems necessary. The conclusions of its review shall be passed on to the Compliance Department, which in turn shall report them to the respective management bodies of the companies.

13 Approval and entry into force of the policy

The governing bodies of the Companies approved this Policy and its subsequent revisions with immediate entry into force and binding effects for all addressees:

- (i) Initial approval: 13th June 2022.



(ii) Revision (2): 28 September 2023.