



ANTI-CORRUPTION POLICY

JULY 2025

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1. CONTEXT OF THE ORGANISATION

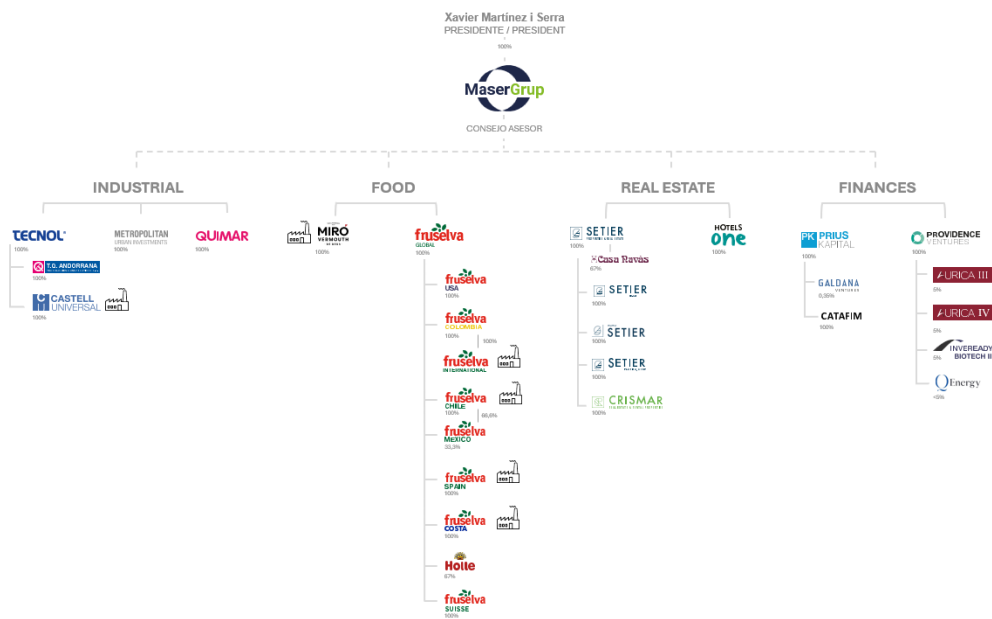
1.1. HISTORICAL AND ORGANISATIONAL CONTEXT

SERVEIS I ADMINISTRACIONS MASERGRUP S.L.U. (hereinafter, "MASERGRUP"), is a family-owned industrial group that was founded in 1997 in Reus by entrepreneur Xavier Martínez i Serra. The Group currently operates as a producer in the following sectors: industrial, healthcare, real estate, food and services.

Since its foundation, MASERGRUP has grown and diversified its activities, remaining faithful to its commitment to innovation, society and the environment.

1.2. ORGANISATIONAL CHART OF THE PARENT COMPANY

The MASERGRUP holding company currently comprises the following companies:



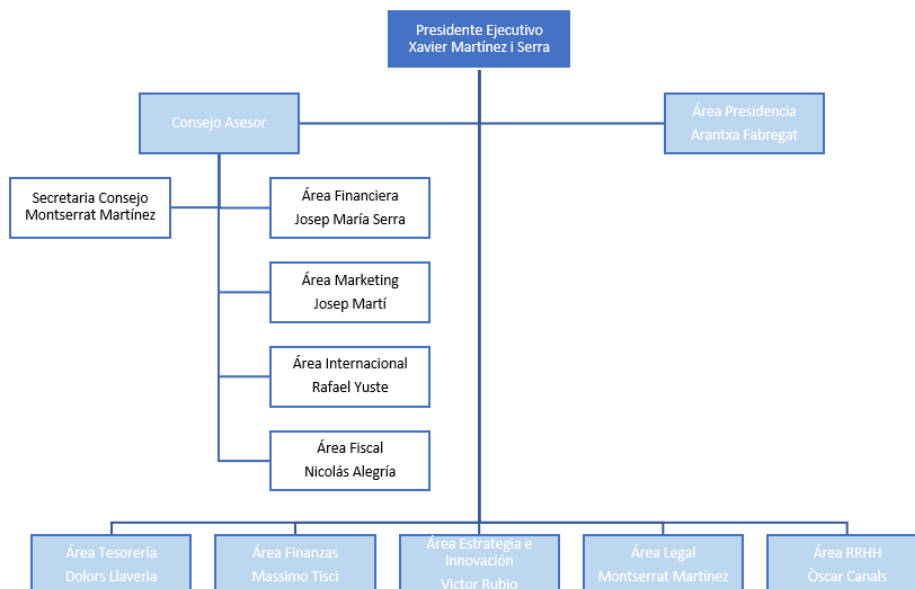
1.3. DIVISIONAL ORGANISATION CHART

The registered office and headquarters of MASERGRUP are in Reus, C/ Joan Fuster nº15, 43206 (Tarragona). However, the companies that make up the Group currently have a presence in the following countries:



1.4. FUNCTIONAL ORGANISATION CHART

At a functional level, MASERGRUP is organised as follows:



2. PREVENTING AND COMBATING CORRUPTION: A DUTY FOR EVERYONE

2.1. WHAT DO WE MEAN BY "CORRUPTION"?

The term "corruption" includes any conduct aimed at soliciting, granting or receiving any unjustified gift, benefit or advantage in exchange for favourable treatment.

TYPES OF CORRUPTION	
PRIVATE	> If the person requesting and/or receiving the gift, benefit or advantage is a director, administrator, employee or collaborator of a commercial company, association, foundation or organisation .
PUBLIC	> If the person requesting and/or receiving the gift, benefit or advantage is a public official .

2.2. OBJECTIVE SCOPE

This Policy defines the principles and guidelines of conduct that must be followed at all times by MASERGRUP employees and managers during the performance of their own and related activities, with the aim of preventing the commission of any act that could be classified as corrupt and that could give rise to criminal liability for the legal entity, pursuant to Article 31 bis of the Criminal Code.

That is why all members of the company, and all third parties related to it, must commit to complying with this Policy, as well as to complying with all the ethical values and principles of conduct that the company has adopted as a guide for action through the creation of its Corporate Compliance system, within the framework of which this Policy is framed.

2.3. INTERESTED PARTIES

With regard to the interested parties¹ (subjective scope of the Anti-Corruption Policy), this Policy is addressed to all employees, managers and the President of MASERGRUP, regardless of their position and geographical location, as well as to third parties related to the company, so that they may be aware of the company's position on non-compliance, understand its ethical commitments and adhere to them.

¹ It is based on the definition of "Interested Party" contained in UNE-ISO 37001, on Anti-Bribery Management Systems, and in ISO 37301, on *Compliance* Management Systems, in which an interested party is understood to be any "person or organisation that can affect, be affected by, or perceive itself as affected by a decision or activity).

That is why all members of the company, and all third parties related to it must commit to complying with its Corporate Compliance system, as well as to complying with the ethical values and principles of conduct that MASERGRUP has adopted as a guide for action.

2.4. OBJECTIVE OF THE POLICY

This Anti-Corruption Policy stems from the company's desire to prevent conduct that, in addition to being susceptible to giving rise to a possible crime under the provisions of the Criminal Code, is clearly contrary to its principles and corporate values.

This Policy is intended to be a guide for all managers, employees, suppliers, distributors and other collaborators of the company so that together they can contribute to the creation, development and consolidation of **ethically sustainable commercial policies** that guarantee **free and fair competition** in the market.

This Anti-Corruption Policy has been drawn up with reference to UNE-ISO 37001 on Anti-Bribery Management Systems.

2.5. RESPONSIBILITY

All members of MASERGRUP are responsible for complying with this Policy and all internal regulations that form part of the Corporate Compliance programme. Department heads must disseminate the content of this Policy among the staff under their responsibility.

Likewise, it is the responsibility of all third parties related to the company to comply with and enforce its Corporate Compliance system, and in particular, its Anti-Corruption Policy and all the guidelines and principles it contains, which will be duly sent to them, as well as to sign an ethical clause and a statement of regulatory compliance to ensure its proper implementation.

2.6. APPROVAL, UPDATING AND DISCLOSURE

This Policy has been approved by the Sole Administrator of MASERGRUP as set out in the Annex on "**Approval and Amendments**" and will remain in force until it is amended or replaced by another version.

The Compliance Officer has provided appropriate access to it to all company employees, as well as to third parties who, due to their relationship with the company, must also be aware of its content.

This Policy, and the entire Corporate Compliance System of the company, will be reviewed every two years (alternate years), as well as whenever there are relevant regulatory or jurisprudential changes, changes in the structure or activity of the company, breaches of its regulations, or for other reasons, which will be duly justified, as decided by the Sole Administrator or the Compliance Officer himself.

Finally, whenever there is a change in the company's Corporate Compliance System for any of the reasons set out in the previous paragraph, and this involves the modification of this Policy, such notification shall be communicated to all members of the company and third parties who, by reason of their relationship with the company, need to be aware of it, and they shall be provided with the most up-to-date version of the Policy.

3. EXPENSES AND GIFTS

3.1. WHAT IS CONSIDERED A "GIFT"?

For the purposes of this Policy, any item that has been promised, offered, made available, requested and/or accepted by administrators, managers or employees, either directly or through a third party, as well as external collaborators of the company, when acting on its behalf, either directly or through a third party, shall be considered a "gift".

3.2. WHEN CAN WE ACCEPT AND/OR GIVE GIFTS?

Employees, managers, administrators and external collaborators dependent on MASERGRUP may not, under any circumstances, give or accept gifts on a personal basis, and in the exceptional event of giving or receiving any, the following procedure shall be followed:

3.2.1. FOR THE ACCEPTANCE OF GIFTS

- (i) The company member who has received the gift shall inform the donor (entity or individual) that the company has an Anti-Corruption Policy whereby its members may not accept gifts on a personal basis.
- (ii) At the time of acceptance of the gift, if it exceeds the reasonably acceptable value (between €50 and €70), this shall be recorded by completing the corresponding form, attached to this Policy as **Annex I**, which shall be signed by both the company member who received the gift and the Compliance Officer, thus expressly recording their authorisation and receipt.
- (iii) Any member of the company who receives a gift exceeding the reasonably acceptable value shall hand it over to the Chair, who shall be responsible for (a) thanking the entity or individual who made the donation, and (b) recording its receipt.
- (iv) The gift shall be raffled among all company employees when the Compliance Officer deems it appropriate.

3.2.2. FOR THE GIVING OF GIFTS

Any member of the company who, in exceptional circumstances, wishes to give a gift must first obtain authorisation from the Compliance Officer by completing the form attached to this Policy as **Annex II**.

Notwithstanding the foregoing, under no circumstances shall the offering, promise, delivery and/or acceptance of gifts, gratuities, personal benefits and/or financial compensation be permissible when:

- × They are intended as a bribe.

- × They are intended for or received from public officials, whether national or foreign, political party leaders, public office holders and/or candidates for such positions.
- × They are intended to influence the recipient to adopt, refrain from adopting or delay the adoption of decisions that compromise their impartiality and good judgment.
- × They are made in consideration of the position held by the recipient.
- × They exceed the reasonable amounts or concepts referred to in the previous section.
- × They are made in the context of or immediately after a public or private procurement process or tender in which the company participates, as well as in the context of or immediately after inspection, judicial or subsidy award procedures.
- × Do not comply with all the requirements and conditions set out in this Policy.

Likewise, it is expressly prohibited to provide the personal address or any other address other than that of MASERGRUP to suppliers and other external collaborators for the receipt of gifts.

3.3. WHAT ABOUT MERCHANDISING PRODUCTS?

The **offering and/or acceptance of merchandising is** generally **permitted**, namely those items that incorporate distinctive signs and have a commercial, promotional or symbolic dimension.

3.4. WHAT ABOUT PROMOTIONAL EXPENSES?

To allocating resources for holding events and carrying out promotional campaigns, the **Marketing Department** shall be provided with an annual budget for promotional expenses.

Prior authorisation from the company's **Compliance Officer** shall be required for promotional expenses. The authorisation request shall indicate, at least, (i) the amount of the expense required and (ii) the purpose for which it is intended, detailing the type of promotional event or activity to be carried out.

If the promotional expense is for sending gifts to customers, suppliers and other business partners, all the provisions of section 2.2 of this Policy shall apply.

The **Marketing Department** shall be responsible for documenting promotional expenses incurred.

3.5. ARE CHARITABLE DONATIONS AND SPONSORSHIP PERMITTED?

MASERGRUP may grant financial assistance, and sponsor causes for legitimate purposes, including charitable projects, sporting and cultural events, etc., provided that such assistance or sponsorship has **been communicated to and approved in advance by the Compliance Officer**, who will also resolve any queries that may arise in this regard.

3.6. WHAT ABOUT DONATIONS TO POLITICAL PARTIES?

Donations to political parties and trade unions are understood to be monetary or in-kind contributions (such as the provision of facilities, products or services) made with the intention of supporting political parties, candidates or initiatives of a political nature.

Any type of donation, direct or indirect, **to political parties or trade unions** on behalf of the company, or when it could be inferred that it is made for the benefit or on behalf of the company, **is strictly prohibited**.

4. CONFLICTS OF INTEREST

4.1. WHAT IS A CONFLICT OF INTEREST?

A **conflict of interest** arises when the interests of the company may be compromised by the personal interests of a member of the company, its partners, employees, directors and/or managers, in such a way that objectivity is lost.

4.2. HOW SHOULD WE ACT IN A SITUATION THAT COULD BE CONSIDERED A CONFLICT OF INTEREST?

Staff and persons associated with the company must **avoid conflicts of interest, always putting the interests of MASERGRUP** before their individual interests. To this end:

- Any employee of the company who does business or intends to do business with a business partner on behalf of the company must report in writing any conflict of interest on their part or on the part of any person related to them that may arise from the conduct of such business.
- Whenever the persons subject to this policy find themselves in a situation that they believe may give rise to a conflict of interest, they must contact the Compliance Officer for instructions on how to proceed.
- Likewise, personnel who, due to their position or function in the company, must make financial or strategic decisions, shall request authorisation from the Compliance Officer to make payments and/or enter contracts with commercial entities, associations or charitable organisations outside the company and of which they are administrators, directors, managers and/or advisors.

5. RELATIONS WITH THIRD PARTIES

5.1. WHAT PROCEDURE SHOULD BE FOLLOWED WHEN CONTRACTING POTENTIAL SUPPLIERS?

MASERGRUP is committed to initiating and maintaining business relationships only with **qualified, reliable and ethical suppliers**. To fulfil this commitment, reasonable measures must be implemented to verify the qualifications and integrity of each supplier before entering binding business relationships.

To achieve maximum impartiality and objectivity when selecting suppliers, the following minimum requirements must be met:

- (i) **Obtain sufficient offers** (at least three) that meet the requirements of the relevant department, clearly specifying the price of the goods or services offered. If it is not possible to obtain three offers, the reason must be justified.
- (ii) **Comply with supplier evaluation processes and promote**, as far as possible, the invitation of new bidders. The bidders and the bids they have made must always be documented.
- (iii) **Select the most favourable bid** (i.e. the one offering the best value for money), specifying the reasons for this choice if it is not based on price.

All purchases of goods or services must be documented by means of the corresponding contracts, which must be filed in the appropriate register once they have been finalised.

There must be a register containing purchase orders, supplier files, corresponding invoices and the final signed contracts.

The company shall ensure that all contracts with suppliers, as far as possible, include an **"Ethics Clause"** whereby suppliers undertake to behave ethically and comply with the law. If the supplier requires the inclusion of its own anti-corruption clauses, the Compliance Officer shall review and authorise them.

Additionally, if suppliers request payment of their invoices by bank transfer to current accounts other than those usually recorded in the company's records, the company shall require, prior to payment, a bank certificate attesting to the ownership of the supplier's new account, which is included as **Annex III** to this Policy.

5.2. CAN I DEAL AND/OR NEGOTIATE WITH THE PUBLIC SECTOR ON BEHALF OF MASERGRUP?

Only persons expressly authorised by MASERGRUP may deal and/or negotiate with public officials, both national and international, in accordance with the powers granted to them in each case.

In this regard, **so-called "facilitation payments" are prohibited**, the purpose of which is to expedite procedures, routine official acts or facilitate the provision of a service, even if they are not intended to obtain an undue benefit.

6. LEADERSHIP AND COMMITMENT

6.1. GOVERNING BODY

The Sole Administrator of MASERGRUP shall demonstrate leadership and commitment to the anti-corruption and anti-bribery system. To this end:

1. Approve this Anti-Corruption Policy.
2. Ensures that the organisation's strategy and the guidelines contained in the Anti-Corruption Policy are aligned.
3. Receives and reviews, every six months, the information sent to it on the content and functioning of the anti-corruption system.
4. Allocate the necessary resources for the effective functioning of the anti-corruption management system and verify that they are distributed and used appropriately.
5. Exercises reasonable supervision over the proper implementation of the company's anti-corruption management system.

6.2. SENIOR MANAGEMENT

Like the Sole Administrator, the company's senior management, understood as the company's Area Directors, must demonstrate their willingness to lead and their commitment to MASERGRUP's Anti-Corruption Policy, and to this end:

1. Ensure that the guidelines and principles contained in this Policy are implemented correctly and that it is properly supervised to prevent any risk of corruption in the company.
2. They shall guarantee the integration of the requirements and guidelines for conduct contained in this Policy into all processes carried out in, by and for the company.
3. They will verify that sufficient and adequate resources are available for the proper functioning of the anti-corruption management system.
4. Communicate both internally and externally about this Policy and all the principles and guidelines of conduct it contains.
5. In carrying out its internal communication work, senior management shall ensure that all employees under its control and responsibility understand the importance of the anti-corruption management system for the company.

6. It will verify that the implementation of the principles and guidelines of conduct contained in this Policy are sufficient and adequate to prevent corruption risks.
7. They will support and assist the staff under their supervision in understanding and correctly applying the guidelines for conduct set out in this Policy.
8. They shall encourage the use of the procedures provided for reporting conduct that they suspect may constitute corruption.
9. They shall ensure that no member of staff suffers reprisals, discrimination or disciplinary measures for any communications they may make regarding the conduct referred to in the previous paragraph.
10. Report every six months to the Sole Administrator on the progress of the anti-corruption management system.

In this way, senior management has overall responsibility for the implementation and compliance of the anti-corruption management system and must therefore ensure that the responsibilities and authorities for the relevant roles are assigned and communicated at all levels of the company.

Department managers are responsible for ensuring that the requirements of the anti-corruption management system are properly applied and complied with within their area of responsibility.

6.3. COMPLIANCE OFFICER

The Sole Administrator and, by delegation, senior management, assign the Compliance Officer the responsibility and authority to:

1. Oversee the design and implementation of the anti-bribery management system by the company.
2. Provide advice and guidance on anti-corruption and anti-bribery matters to all company employees and related third parties who must comply with the company's *compliance* system.
3. Report on the performance of the anti-corruption management system to the Sole Administrator and senior management, which is why the Compliance Officer has quick and direct access to these individuals.

To perform these functions properly, the Compliance Officer has the necessary financial and other resources, which are also available to all other persons (in particular senior management) who have the necessary competence, position, authority and independence.

6.4. DELEGATION OF DECISION-MAKING

When a decision must be made in which there is more than a low risk of corruption, its approval must be supervised by the Compliance Officer and, if necessary due to the nature of the decision or its repercussions, by senior management; and if the decision must be made by senior management, its approval shall require the supervision of the Compliance Officer and the approval of the Sole Administrator. One of the essential elements to be monitored will be the possible existence of conflicts of interest.

In any case, it shall be verified that the persons who must take and execute decisions are competent, based on their level of education, training or experience.

All information generated during the delegation and decision-making process will be duly documented and retained.

6.5. TITUTION PROCESS FOR NEW EMPLOYEES

The conditions for hiring new employees will include a commitment to comply with the Anti-Corruption Policy (as well as, in general, compliance with the *Corporate Compliance* system implemented by MASERGRUP), as well as acceptance of the company's right to impose disciplinary sanctions in the event of a breach of internal regulations by the employee.

All new employees (as well as employees already on the payroll at the time of approval of this Policy) will receive a copy of the Anti-Corruption Policy and will receive *compliance* training, which will include specific training on the rules and principles contained in this Policy.

Furthermore, employees shall be informed, and it shall be a condition of employment, that no member of the company shall suffer retaliation, discrimination or disciplinary measures², for:

1. Refusing to participate in, or rejecting, any activity that the employee has reasonably judged to involve more than a low risk of bribery or corruption that has not been mitigated by the company.
2. Raising concerns or reporting in good faith on the reasonable belief, actual attempt or suspicion of bribery or violations of the Anti-Corruption Policy or the *Corporate Compliance* system (except where the employee was involved in the violation).

In addition, for jobs that are exposed to a particular risk of corruption (e.g., positions that require maintaining fluid relationships with public officials), procedures specifically

² Shall be understood as retaliation or disciplinary measures, including, but not limited to, the following actions: threats, isolation, demotion, impediments to promotion, transfer, dismissal, *bullying*, victimisation or other forms of harassment).

designed to prevent situations that could lead to acts of corruption will be implemented. Three specific procedures are established:

1. Firstly, a due diligence procedure will be carried out before hiring new employees, as well as before employees who are already part of the company are transferred or promoted by the company, so as to ensure, to the extent possible, that such employees have the appropriate characteristics to be employed or relocated, and that it is reasonable to believe that they will comply with the requirements of the Anti-Corruption Policy and, in general, the Corporate Compliance system.
2. Secondly, bonuses and performance targets and/or other incentive elements of employee remuneration shall be reviewed periodically (at least once a year) to verify that reasonable safeguards are in place to prevent the promotion of acts that could be classified as corruption (e.g., bribery of public officials or third-party companies to obtain the award of contracts).
3. Thirdly, all company employees, including senior management, will sign an annual declaration of responsibility regarding compliance with all internal regulations, and specifically with the rules contained in this Anti-Corruption Policy.

6.6. AWARENESS AND TRAINING

MASERGRUP will ensure that all company employees are aware of and receive training on corruption. This anti-corruption and anti-bribery training will cover, among other things, the following aspects:

1. The principles and guidelines of conduct contained in the Anti-Corruption Policy and their duty to comply with them.
2. The risk of bribery and corruption that exists in their areas of work and the damage that committing such acts can cause, both to them personally and to the company.
3. The circumstances in which situations of corruption may arise in relation to their activities, as well as how to recognise such circumstances.
4. How to recognise and respond to requests or offers of bribery.
5. How they can help prevent and avoid bribery and recognise indicators of corruption risk.
6. The necessity and importance of their contribution to the effectiveness of the anti-corruption management system, including the benefits of improving the corruption prevention system and reporting any reasonable suspicion of acts that could be classified as corrupt.

7. The implications and potential consequences of non-compliance with the requirements of the anti-corruption management system contained in this Policy.
8. How and to whom they should report any concerns they may have regarding corruption prevention, as well as specific training on the use of the Compliance Channel implemented by the company.
9. Information on training and all resources available to them for the prevention of corruption.

Compliance and anti-corruption training shall be provided regularly, at least annually, and whenever deemed appropriate and necessary in accordance with new duties assigned to certain employees or changes in the organisation's activities or structure.

The company will also seek to ensure anti-corruption awareness and training for its business partners acting on its behalf or for its benefit, where there is a risk of corruption due to the activities they carry out. In raising awareness, the company will identify the business partners for whom awareness and training are necessary, the content of such training, and how it should be provided. In any case, the company's business partners must sign a statement of compliance with the compliance system implemented by the company, including a commitment to comply with anti-corruption regulations (i.e., this Anti-Corruption Policy).

MASERGRUP will document all information generated in these training procedures, including its content, as well as who received the training and when.

7. NOTIFICATION OF NON-COMPLIANCE WITH ANTI-CORRUPTION REGULATIONS AND INVESTIGATION PROCESS

7.1. INTEGRITY CHANNEL ("SII")

The Internal Information System Policy ("SII") and the GIR Protocol **for the management, investigation and resolution of reports of non-compliance**, approved by MASERGRUP, set out all the company's regulations on the reporting of regulatory breaches, the procedure for investigating reports received and the imposition of the corresponding disciplinary sanctions.

Based on the Policy and Protocol, which provide detailed information on the functioning of MASERGRUP's non-compliance reporting and investigation system, the following guidelines are established for reporting, in this case, any breaches of anti-corruption regulations of which employees or third parties may have knowledge or reasonable suspicion.

INTERNAL INFORMATION SYSTEM ("IIS")	
OBJECTIVE	> To report inappropriate and irregular conduct
AVAILABLE	> Corporate website > canalintegridad@masergrup.com
RESPONSIBLE FOR THE SII	> Mr. Xavier Grau Beltran <i>Compliance Officer</i>

Likewise, at the request of the communicator, a **face-to-face meeting** may be held with the SII Manager to explain or detail the facts of the communication. In this regard, if a report of non-compliance is received and the informant fails to report it, the SII Manager will be responsible for reporting it through the platform set up for this purpose. In this case, verbal communications will be duly documented in accordance with the provisions of section 8 of the SII Policy.

The Integrity Channel or SII may be used by any person, whether a member of MASERGRUP or an external third party, in particular suppliers, customers and business partners, regardless of whether they have already terminated their professional relationship with the company.

Likewise, communications may be made either **identified** or **anonymously** and will be treated and considered in the same manner.

In any case, the company undertakes to treat all communications of non-compliance with the utmost **confidentiality** and respect for the processing of the personal data of the communicators and those identified as responsible for the non-compliance breaches. As a measure to guarantee such confidentiality, it is expressly stated that the exercise of the right of

access by the person to whom the communication relates does not imply access to data relating to the identity of the person making the communication. Likewise, and to guarantee the anonymity of the person making the communication, all persons who, by reason of their duties within the company, become aware of the communications made, are obliged to maintain professional secrecy regarding the identity of the person making the communication.

To this end, all communications shall be confidential from the outset of the procedure. Notwithstanding the foregoing, in exceptional circumstances, the company may disclose such information to a competent authority or to a judge or court when legally required to do so. In any case, the whistleblower shall be informed before their identity is disclosed, unless such disclosure could compromise the investigation or legal proceedings.

Reporters must have reasonable grounds to believe, considering the circumstances and the information available to them at the time of reporting, that the facts brought to the company's attention are true. This requirement is an essential safeguard against malicious, frivolous or abusive reports, to ensure that those who, at the time of reporting, deliberately and knowingly provide incorrect or misleading information, do not enjoy the protection against retaliatory measures detailed in this Anti-Corruption Policy.

7.2. PROHIBITION OF RETALIATION AND PROTECTION MEASURES FOR WHISTLEBLOWERS OF REGULATORY NON-COMPLIANCE IN MATTERS OF BRIBERY AND CORRUPTION

Those who make any kind of report of non-compliance with this Anti-Corruption Policy, as provided herein and in good faith, are protected against any kind of retaliation, discrimination or penalisation because of the reports made. No measures shall be taken, either during the investigation or after its completion, that could harm the whistleblower in their professional career or lead to the termination of their employment. In addition, MASERGRUP will punish any type of retaliation against whistleblowers acting in good faith.

The prohibition of retaliation shall not prevent the adoption of appropriate disciplinary measures when the internal investigation determines that the communication is false and that the communicator made it know it to be false and acting in bad faith.

In any case, **retaliation shall be understood to mean** any direct or indirect action or omission that takes place in a work context, is motivated by an internal or external communication or by a public disclosure and causes or is likely to cause unjustified harm to the whistleblower. By way of example, and without this being an exhaustive list, the following are considered retaliation:

- (i) Suspension of the employment contract, dismissal or termination of the employment or statutory relationship, including non-renewal or early termination of a temporary employment contract after the probationary period has expired.

- (ii) Early termination or cancellation of contracts for goods or services.
- (iii) Imposition of any disciplinary measure, demotion or denial of promotion, and any other substantial change in working conditions.
- (iv) Failure to convert a temporary employment contract into a permanent contract, where the worker had legitimate expectations that he or she would be offered permanent employment.
- (v) Damages, including reputational damage, or economic losses, coercion, intimidation, harassment or ostracism.
- (vi) Negative evaluation or references regarding work or professional performance.
- (vii) Inclusion on blacklists or dissemination of information in a specific sector, which hinders or prevents access to employment or the contracting of works or services.
- (viii) Refusal or cancellation of a licence or permit.
- (ix) Denial of training.
- (x) Discrimination, or unfavourable or unfair treatment.

The measures set out in points (i) to (iv) above shall not be considered retaliation when they are carried out in the regular exercise of management powers under labour legislation or regulations governing the status of public employees, due to circumstances, facts or proven infringements unrelated to the submission of the report.

Likewise, in accordance with Article 36 of the Whistleblower Protection Act, it is hereby stated that any person whose rights have been violated as a result of their communication or disclosure, once the two-year period has elapsed, may request protection from the competent authority, which, in exceptional and justified cases, may extend the period of protection, after hearing the persons or bodies that may be affected. (the refusal of such an extension of the protection period must be justified).

Likewise, it is hereby stated that any acts intended to prevent or hinder the submission of communications and disclosures, as well as those that constitute retaliation or cause discrimination following their submission under the Whistleblower Protection Act, shall be null and void and shall give rise, where appropriate, disciplinary or liability measures, which may include the corresponding compensation for damages to the injured party.

MASERGRUP, recognising the purposes of Article 20 of the Whistleblowing Directive and Article 37 of the Whistleblower Protection Act, shall ensure that all its members have access, as appropriate, to the following support measures:

- (i) Comprehensive and independent information and advice on the procedures and remedies available to them in relation to regulatory compliance, protection against retaliation, and their rights as affected persons.

- (ii) Effective assistance, essentially from the Head of the Internal Reporting System, against retaliation.
- (iii) Legal assistance in any judicial or administrative proceedings that may arise as a result of their communications, whether national or cross-border, in the latter case in accordance with Community legislation.
- (iv) Financial assistance and support measures in their capacity as whistleblowers, including psychological support after assessment of the circumstances arising from the submission of the report.

All the above, in addition to any assistance to which the reporting person may be entitled under Law 1/1996 of 10 January on free legal aid for representation and defence in legal proceedings arising from the submission of the report or public disclosure.

Also, with regard to reports, this Anti-Corruption Policy shall be made available to all MASERGRUP employees, as well as to all its business partners and third parties who, due to their relationship with the company, need to be aware of its content.

7.3. DOCUMENTATION OF INFORMATION

MASERGRUP will document all information generated by the anti-corruption management system (in particular, all information relating to reports of regulatory non-compliance and subsequent analysis and investigation of the facts reported).

Three specific aspects are relevant for such documentation:

1. The correct identification of the communicator and/or the information analysed.
2. The format in which the information is documented (the use of PDF format will be prioritised).
3. The medium used (electronic media will be prioritised).

It shall be ensured that the documented information is available and suitable for use when and where it is needed, and that it is properly protected (e.g. against loss of confidentiality, misuse or loss of integrity).

This information documentation system shall also apply to all information received from outside the company (e.g. through third-party communicators).

7.4. DUE DILIGENCE ON BUSINESS PARTNERS IN THE FIELD OF ANTI-CORRUPTION

In relation to business partners over whom MASERGRUP has no control, it will carry out a corruption risk assessment of such business partners based on the activities they carry out. To this end, it will implement the following procedures:

1. The company will determine whether the business partner has sufficient anti-bribery and/or anti-corruption controls in place to manage the risk of such acts being committed.
2. In cases where the company determines that the business partner does not have the controls mentioned in the previous paragraph, or it is not possible to determine whether they are effectively implemented, it will proceed as follows:
 - a. Firstly, and this will be done in all cases (regardless of whether the business partner has an adequate anti-corruption and/or anti-bribery system in place), the company will have the business partner sign a statement of responsibility in which they commit to complying with the entire MASERGRUP Corporate Compliance system, and in particular, to comply with the regulations on anti-corruption (i.e., the guidelines described in this Anti-Corruption Policy).
 - b. Where possible, the company will require the business partner to implement its own anti-bribery and anti-corruption controls in relation to the transactions, projects or activities they have in common.
 - c. When it is not possible to require the business partner to comply with the provisions of the previous paragraph, this will be a factor to be considered when assessing whether to contract with that business partner, and how this will be done if the contract is signed.

In relation to the anti-bribery commitments of business partners, the company reserves the right, in all cases, to terminate the relationship with the business partner in the event of an act of bribery or corruption by, on behalf of, or for the benefit of the business partner, especially when such act has been committed in the course of activities carried out for MASERGRUP.

When due diligence carried out in a specific transaction, project, activity or relationship with a business partner determines that the risks of corruption or bribery cannot be adequately managed with existing controls, and that the business partner is unable or unwilling to implement new anti-corruption and/or anti-bribery controls, or to improve existing ones to bring them into line with the risks detected, the company will take the necessary measures to terminate, interrupt, suspend or withdraw from the business relationship as soon as possible; or, in the case of a new business relationship proposal, its approval will be suspended or denied.

7.5. INVESTIGATION OF COMMUNICATIONS ON POSSIBLE ACTS OF CORRUPTION AND BRIBERY

MASERGRUP has developed, in its **GIR Protocol**, the procedure to be followed for the investigation and resolution of breaches, in this case, of anti-corruption regulations. The main lines of this procedure are as follows:

1. Any information received by the company regarding the commission of a possible act of corruption will be evaluated and investigated.
2. Sufficient disciplinary measures are provided for, as well as communication to the authorities, if an act that could be classified as corruption is verified.
3. Those responsible for the investigation shall be granted sufficient authority and autonomy.
4. The cooperation of relevant personnel in the investigation will be requested.
5. The Compliance Officer will be involved in any investigations carried out.
6. The investigation shall be conducted confidentially, and the results and conclusions reached shall also be confidential.
7. The investigation may be carried out by a business partner when advisable, due to the nature of the facts under investigation and the persons involved.

8. INTERNAL AUDIT

MASERGRUP will conduct internal audits annually to provide information on whether the Corporate Compliance system, in relation to the prevention of corruption, complies with the company's anti-corruption objectives and with the provisions of this Anti-Corruption Policy, and that it is being implemented correctly.

For each internal audit, the planning methods and requirements and the preparation of reports will be determined, considering the importance of the processes involved and the results of previous audits. The audit criteria and scope will also be determined.

In any case, competent auditors shall be selected, and audits shall be carried out to ensure the objectivity and impartiality of the audit process.

The results of the audits shall be brought to the attention of the company's Sole Administrator, senior management, and the Compliance Officer, and shall be retained as evidence of the implementation and development of the internal audit plan.

Audits shall be reasonable and proportionate to the risk and shall consist of a review of the procedures, controls and systems designed to prevent acts of corruption. To ensure that audits are conducted objectively and impartially, they shall be carried out by an independent third party, by the Compliance Officer, or by an appropriate person from a department other than the one being audited and shall be duly supervised by the Compliance Officer. This ensures that no auditor audits his or her own area of work.

9. CONTINUOUS IMPROVEMENT

MASERGRUP will work continuously to improve the suitability, adequacy and effectiveness of the anti-corruption system in response to the specific corruption risks faced by the company.

Furthermore, whenever a breach of the regulations contained in this Anti-Corruption Policy arises, the company will:

1. React immediately to any breach of which it becomes aware, taking the necessary measures to control and correct it, as well as to deal with the consequences arising from the breach.
2. Assess the need to take additional measures to eliminate the causes of the breach, so that it does not happen again. To this end, it will study the breach that has occurred, determine its causes, and analyse whether there may be other similar breaches or breaches that could potentially occur.
3. It shall implement any other measures deemed necessary.
4. It shall review the effectiveness of any corrective action or measure taken.
5. It shall assess the need to make changes to the company's anti-corruption system.

All information generated from the receipt of the breach report to the last corrective measure taken shall be duly documented and retained for the purpose of evidencing the nature of the breach and the corrective measures applied to remedy it and prevent its recurrence, as well as the results achieved with the corrective measures applied.

10. COMPLIANCE WITH THE ANTI-CORRUPTION POLICY

10.1. DO I HAVE TO COMPLY WITH THE RULES CONTAINED IN THE ANTI-CORRUPTION POLICY?

This Policy is **mandatory** for all administrators, managers, employees and external collaborators of MASERGRUP.

Failure to comply with this Policy may result in MASERGRUP initiating **disciplinary proceedings** and, where appropriate, applying the corresponding disciplinary measures, in accordance with the seriousness of the breach and within the applicable legal framework in accordance with the Workers' Statute and Collective Agreements.

In this regard, the Compliance Officer shall coordinate, together with the company's administrators, the actions to be taken in relation to MASERGRUP personnel, respecting in all cases the principle of proportionality and preserving the right of defence of the affected party, who may give an account of what has occurred in accordance with the terms set out in the document "**Procedure for the management, investigation and resolution of communications**".

MASERGRUP staff and persons associated with MASERGRUP who have observed inappropriate or irregular conduct that may violate the content of this Policy shall be obliged to report any inappropriate conduct or breach through the communication channel set up by the Compliance Officer for this purpose, in full compliance with the guarantees and principles governing the use of the channel.

10.2. DOES THE COMPLIANCE OFFICER REVIEW THE CONTENT OF THE ANTI-CORRUPTION POLICY?

The Compliance Officer **shall review** the content of this Policy **on an annual basis** to ensure that it is fully compliant with current regulations and international standards on anti-corruption and regulatory compliance, without prejudice to any reviews that may be carried out because of communications received through the communications channel.

Notwithstanding the foregoing, in the event of a significant change of a legal, organisational or any other nature that justifies its adaptation and/or updating, the Compliance Officer shall also proceed to review and modify it immediately.

11. CHANNEL FOR QUESTIONS AND/OR SUGGESTIONS

Remember that if you have any **questions and/or suggestions** regarding the interpretation and/or application of the content of this Policy, regarding the company's Corporate Compliance System, as well as any questions regarding regulatory compliance, these should be raised immediately with the Compliance Officer by sending them to the following email address set up for this purpose:

compliance@masergrup.com

However, the **reporting** or communication of inappropriate or irregular conduct that may violate the content of this Policy must be reported through the **Integrity Channel** ("SII") set up for this purpose, as provided for in section 7.1. of this Policy.

COMMUNICATION CHANNELS	
QUESTIONS AND SUGGESTIONS FROM CORPORATE COMPLIANCE	> Consultation Channel compliance@masergrup.com
REPORT INAPPROPRIATE AND IRREGULAR CONDUCT	> SII or Integrity Channel (<i>section 7.1</i>) Corporate website canalintegridad@masergrup.com

APPENDIX I. INFORMATION FORM FOR THE ACCEPTANCE OF GIFTS AND GRACES

GIFT AND GRATUITY ACCEPTANCE FORM	
Name of the employee/manager receiving the gift	
Position held in the company and department to which they are assigned	
Full description of the gift and/or gratuity received	
Approximate value of the gift and/or gratuity	
Giver of the gift and/or gratuity, indicating their full name, the entity to which they belong and their position within that entity.	
Are you aware of any gifts and/or gratuities accepted from the same entity or the same issuer by MASERGRUP staff during the last twelve months?	
Date of receipt of the gift and/or gratuity	

[OPTION 1: The gift is hereby accepted in accordance with the provisions of the company's Anti-Corruption Policy.]

[OPTION 2: The gift and/or gratuity received and described in this form is hereby handed over to the Presidency for subsequent distribution among MASERGRUP employees, in accordance with the provisions of the company's Anti-Corruption Policy.]

The Employee

Compliance Officer /
Human Resources Department

APPENDIX II. INFORMATION FORM FOR THE DELIVERY OF GIFTS AND GRACES

GIFT AND GRATUITY FORM	
Name of the person giving the gift	
Position held in the company and department to which they belong	
Full description of the gift and/or gratuity	
Approximate value of the gift and/or gratuity	
Recipient of the gift and/or gratuity, indicating their name, surname, entity to which they belong, and position held therein.	
Are you aware of any gifts and/or gratuities given to the same entity or recipient by MASERGRUP staff during the last twelve months?	
Reason for giving the gift and/or gratuity	
Expected date of delivery of the gift and/or gratuity	

This form is accompanied by a document certifying the value of the gift and/or gratuity in question.

The Employee

Compliance Officer

ANNEX III. PROCEDURE FOR REQUESTING A CHANGE OF BANK ACCOUNT FOR SUPPLIERS/BUSINESS PARTNERS

MASERGRUP suppliers or business partners who wish to change their bank account for the payment of invoices must request this in writing by submitting the following form and accompanying it with a **bank certificate proving their ownership of the bank account** to which the change is requested (issued within the previous twelve months).

The Treasury Manager will be responsible for filing both the forms and the corresponding bank certificates.

BANK ACCOUNT CHANGE REQUEST FORM	
Name of supplier/business partner	
ID number	
Current bank account number	
Bank account number to which you wish to change	
Bank of the new account to which you wish to make the change	
Do you confirm that you are the holder of the bank account to which you wish to make the change?	

This request to change bank accounts *can only be made if accompanied by a certificate of ownership of the account to which the change is to be made.*

The supplier/business partner hereby provides a copy of the bank certificate issued on ____ of _____ of _____, by the entity _____, certifying the applicant's ownership of the bank account to which the change is to be made.

Name of supplier/business partner:

_____, on _____ of _____ of _____.

(Signature of the supplier/business partner)

ANNEX IV. APPROVAL AND AMENDMENTS

APPROVAL AND AMENDMENTS	
VERSION NUMBER	2
APPROVER	Sole Administrator
RESPONSIBLE	<i>Compliance Officer</i>
DATE OF FIRST APPROVAL	March 2025
DATE OF FIRST AMENDMENT	July 2025