

## ANTI-CORRUPTION POLICY

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**PUBLICATION DATE:** 13<sup>th</sup> of January, 2022

### SCOPE OF APPLICATION

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This policy shall apply to Grupo Empresarial IC S.L. and the companies that comprise it, hereinafter "Grupo IC", as well as the members of the board of directors and all employees of the companies that comprise Grupo IC.

### OBJECTIVE

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To comply with the highest standards of integrity, transparency, respect for law and human rights, complying with all of the values that are set out in our Code of Ethics.

### COMMITMENTS

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To promote a culture of integrity, both within the company and with employees, suppliers and customers.

Not to accept personal gifts, commissions, benefits, reimbursements or compensation in cash or in kind from Grupo IC customers, suppliers or partners, of a value that could exceed token or promotional value. Gifts of more than token value will be understood to be a gift to the company and will be donated by the company to charities.

To maintain the principle of political neutrality, not interfering politically in the communities where it carries out its business activities, respecting the different opinions and sensitivities of the people linked to the company.

To engage with public authorities and institutions in a lawful and respectful manner, neither accepting nor offering gifts or commissions, in cash or in kind.

To comply and enforce compliance with generally accepted accounting principles and standards and establish internal and external risk management and control systems appropriate to the characteristics of the company.

To maintain the company's books and records accurately and honestly, so as to enable information to be obtained and decisions to be made in an informed and responsible manner.

All our employees have a responsibility to report any conduct that they may believe, in good faith, to be a violation of our policies or Code of Ethics to their immediate manager or in accordance with established procedures. Managers must take appropriate action to resolve any matter brought to their attention.

A handwritten signature in blue ink, appearing to be "A. Miró Cuello".

Alberto Miró Cuello

CEO