



ANTI-CORRUPTION AND ANTI-BRIBERY POLICY
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COMPLIANCE PROGRAMME

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PREPARED	REVISED	APPROVED
Criminal Compliance Office	Senior Management	Board of Directors

Important information about this document

Identification	Anti-Corruption and Anti-Bribery Policy
Replacing regulation	None
Repealing regulation	None
Related regulation	Code of Ethics and Conduct
Section of the Code of Ethics and Conduct that it enables	6.5. Prevention of corruption, bribery and any form of fraud
Affected department and area	All departments and areas at ALFANAR
Affected personnel	<ul style="list-style-type: none"> Members of ALFANAR Business Partners, as applicable
Responsible supervisor	Criminal Compliance Office
Approval date	30/06/2025
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1. CONTEXT

*Corruption*¹ and *Bribery*² are widespread phenomena that raise serious social, moral, economic and political concerns. They undermine democracy and the rule of law, hinder development and distort competition. They also destroy trust in institutions, erode the quality of life and lead to economic and social inequality, as well as human rights violations.

Corruption and *Bribery* have far-reaching consequences that affect businesses, economies and societies around the world. Therefore, leading international organisations and standards point out that laws alone are not sufficient to solve the problem and that companies have a responsibility to proactively contribute to the fight against *Corruption* and *Bribery* in all its forms. This can be achieved through a corporate culture of integrity, transparency, honesty and compliance.

As a sign of its commitment to full compliance with the law and to respect the ethical principles and values expressed in its *Code of Ethics and Conduct*³—among which is integrity as the main value, rejecting any form of *Corruption* and *Bribery*—ALFANAR⁴ voluntarily assumes the responsibility and commitment to actively participate in the challenge of preventing and combating *Corruption* and *Bribery*.

At ALFANAR the *Board of Directors*⁵ is responsible for approving and updating the corporate policies that govern the *Organisation's* operations, as well as setting its tone and culture. As part of the fulfilment of these responsibilities, the *Board of Directors* has approved this *Anti-Corruption and Anti-Bribery Policy*⁶.

2. PURPOSE

The purpose of this *Policy* is to reaffirm and reinforce ALFANAR 's commitment to strict compliance with the law, and specifically with the regulations for the prevention and fight against *Corruption* and *Bribery*, by enabling the ethical principles and values expressed in the *Code of Ethics and Conduct*.

This *Policy* sets forth ALFANAR 's position of zero tolerance for any practice or activity that may be classified as active or passive *Corruption* or *Bribery*.

This *Policy* establishes a basic framework for compliance with anti-corruption and anti-bribery legislation, in accordance with the international standard ISO-UNE 37001, on Anti-bribery Management Systems, which allows ALFANAR to prevent, detect and combat *Bribery* and *Corruption* in all its forms.

¹ **Corruption:** any act in which a person abuses his or her position of power, authority or trust to obtain an improper benefit or unfair advantage for himself or herself or others.

² **Bribery:** The offer, promise, delivery, acceptance or solicitation of an improper advantage of any value (financial or non-financial), directly or indirectly, and regardless of location, in violation of applicable law, as an inducement or reward for a person to act or refrain from acting in connection with the performance of that person's obligations.

³ **Code of Ethics and Conduct:** corporate document that describes the ethical commitments voluntarily acquired by ALFANAR and the conduct expected from the *Members of the Organisation* when performing their activities at ALFANAR, and from other people who have a relationship with the *Organisation*.

⁴ **ALFANAR / the Organisation:** includes the company ALFANAR ENERGÍA ESPAÑA, SLU, as well as the rest of the group entities that have adopted this *Policy*.

⁵ **Board of Directors:** the governing body that has the primary responsibility and authority for ALFANAR 's activities, governance and policies and to which *Senior Management* reports and is accountable. In this context, *Senior Management* refers to the/those employee(s) who exercise(s) powers inherent to the legal ownership of ALFANAR, and related to its general objectives, with autonomy and full responsibility limited only by the criteria and direct instructions established by the *Board of Directors*.

⁶ **Anti-Corruption and Anti-Bribery Policy:** set of provisions contained in this document, also referred to as the "*Policy*", on the prevention of *Corruption* and *Bribery*.

3. SCOPE OF APPLICATION

3.1. Personnel

This *Policy* is binding on all *Members of ALFANAR*⁷ who, regardless of their position and the territory from which they operate, have the obligation to:

- Know and comply with this *Policy* when performing their duties.
- Actively contribute to its implementation.
- Report any behaviour that may constitute a violation of the content of this *Policy*.
- Participate in the training activities to which they are invited.

Since any inappropriate behaviour carried out by a *Business Partner*⁸ may entail a risk of "contamination" or "contagion" for *ALFANAR* and have negative effects on the reputation and image of the *Organisation*, this *Policy* may be extended to *Business Partners* based on their specific circumstances, who must encourage and promote the application of ethical principles and behaviours aligned with those established here.

3.2. Material scope

The activities affected by this *Policy* are all those carried out by *ALFANAR*, or which it may undertake in the future, to carry out its business activity.

This *Policy* applies to all areas and functions that carry out these activities.

4. PRINCIPLES AND COMMITMENTS

The basic principles of action and commitments on which this *Policy* is based are:

- **Culture of integrity and compliance:** *ALFANAR* promotes a culture of integrity, honesty, transparency and full compliance with the law in the performance of its business activities.
- **Ethics in relationships:** *ALFANAR* bases its relationships with *Business Partners* and *Third Parties*⁹ on the highest standards of integrity and business ethics.

In the specific case of public authorities and administrations, *ALFANAR* undertakes to adopt the appropriate measures to ensure that relations between the *Members of the Organisation* and any public administration and *Public Official*¹⁰ are based on cooperation, transparency and honesty, avoiding any behaviour that may be perceived as an attempt to obtain undue advantages or benefits, whether directly or indirectly, ensuring that the image and reputation of *ALFANAR* is protected at all times.

⁷ **Members of ALFANAR / of the Organisation:** members of the *Board of Directors*, members of *Senior Management*, employees, temporary workers or those under a collaboration agreement and any others hierarchically subordinate to any of the above.

⁸ **Business Partners:** any external party with which the *Organisation* has, or plans to establish, some type of business relationship.

⁹ **Third party:** natural or legal person who is independent of the *Organisation*.

¹⁰ **Public Official(s):** any person holding a legislative, administrative or judicial office, whether by appointment, election or succession, or any person exercising a public function, including for a public body or for a public enterprise, or any officer or agent of a local or international public organisation, or any candidate for a *Public Official* position.

- **Prohibition of all forms of *Corruption and Bribery*:** ALFANAR strongly condemns any practice that, in addition to contravening applicable law, is contrary to its ethical values as stated in the *Code of Ethics and Conduct*. In this regard, ALFANAR does not tolerate *Corruption and Bribery* under any circumstances. This principle of "zero tolerance" towards business *Corruption, Bribery* and any form of fraud is absolute and prevails over any potential benefit for the *Organisation*.

ALFANAR declares itself opposed to influencing the will of persons outside the *Organisation*, whether in the private or public sector, national or foreign, to obtain any direct or indirect benefit through the use of unethical practices. Other persons or entities are not permitted to use such practices with the *Members of the Organisation*.

- ***Gifts*¹¹ and *Hospitality*¹²:** ALFANAR prohibits offering, requesting, promising, granting and accepting, directly or indirectly, *Gifts* and *Hospitality* that: i) do not comply with applicable legislation; ii) are not accepted by social customs; iii) are contrary to the values and principles set out in the *Code of Ethics and Conduct*; iv) may compromise independence and impartiality in decision-making; v) are made to obtain a business advantage or undue preferential treatment; or vi) may damage the image and reputation of ALFANAR. *Gifts* and *Hospitality* in cash or in goods easily convertible into cash are expressly prohibited.
- ***Facilitation Payments*¹³:** ALFANAR expressly prohibits *Facilitation Payments* as a means of initiating or expediting administrative processes or procedures.

However, ALFANAR recognises that the request for such payments is sometimes supported by a form of extortion. *Members of the Organisation* must refuse to make these *Extortion Payments*¹⁴, unless there is an imminent risk to their physical safety or that of their family. In such circumstances, ALFANAR accepts that staff may use their best judgement and inform their hierarchical superior, the legal department or the *Criminal Compliance Office*¹⁵ as soon as possible through available communication channels.

- ***Political Contributions*:** ALFANAR maintains a position of strict political neutrality and does not make contributions to political parties, associations or institutions linked to them, nor to representatives of political parties, *Public Officials* or candidates for public office.

However, ALFANAR recognises the right of the *Members of the Organisation* to exercise their freedom of expression and respects their freedom to participate in political activities and make political contributions, provided that this is strictly within their private life and not perceived as a means of unduly influencing the awarding of public contracts or bids or obtaining a decision in favour of the *Organisation*.

- ***Donations*¹⁶ and similar benefits:** ALFANAR, within the framework of its corporate social responsibility activities, provides for the possibility of making *Donations* to charities or non-profit organisations on an exceptional basis. In any case, these donations must be permitted

¹¹ ***Gift*:** an item of value that is given or received openly and transparently, as a symbol of gratitude.

¹² ***Hospitality*:** any attention, usually of a social nature, offered or received in a context of business and social activities.

¹³ ***Facilitation Payment*:** a relatively minor payment made to a *Public Official* or a person assigned similar processing or certification functions, to ensure or expedite the course of a necessary procedure or action, and which does not entail a discretionary act on their part.

¹⁴ ***Extortion Payments*:** payments made under threat, extortion or any other circumstance that may endanger the integrity or life of those making them.

¹⁵ ***Criminal Compliance Office*:** an independent internal body at ALFANAR empowered with the power to take initiatives and perform oversight and entrusted with the responsibility of supervising the operation and observance of the *Criminal Compliance Model*, among other things. The existence of this body is in response to the requirements established in Spanish criminal legislation (Article 31 bis of the Criminal Code).

¹⁶ ***Donation*:** something of value that is transferred free of charge to another person or entity, who accepts it.

by current legislation, made in accordance with the *Organisation's* internal regulations, and meet a series of objective criteria.

ALFANAR prohibits making charitable donations in its name for the purpose of obtaining undue advantages or to cover up improper payments to authorities, *Public Officials* or entities outside of ALFANAR.

- **Sponsorships¹⁷:** ALFANAR prohibits sponsorship, whether on its own behalf or on the behalf of the personnel of *Members of the Organisation*, to obtain or retain business or to obtain an improper commercial advantage.
- **Due diligence:** ALFANAR takes care in the selection, formalisation and maintenance of relationships with *Members of the Organisation* and *Business Partners*, so that their behaviour is aligned with ALFANAR's values, including respect for laws and ethical standards.

From an external perspective, establishing business relationships with *Business Partners* without complying with the minimum due diligence duties with respect to *Third Parties* is prohibited.

- **Conflict of interest:** ALFANAR pays special attention to those situations that may involve a potential *Conflict of Interest*¹⁸ between its interests and the personal interests of the *Members of the Organisation* and *Business Partners*.

Members of ALFANAR must always act with loyalty and transparency, avoiding any situation that creates a conflict between their personal interests and those of the *Organisation*. They must disclose any actual or potential *Conflicts of Interest* that directly or indirectly relate to their line of work.

- **Use of confidential and privileged information:** *Members of ALFANAR* must maintain the strictest confidentiality regarding all privileged information to which they have access as a result of their professional activities. They must also refrain from using it to obtain an improper commercial advantage or personal benefit, whether for themselves or for those close to them.
- **Financial and accounting information:** ALFANAR is committed to acting with integrity in financial management, promoting transparency, accurate accounting records and accountability.

Members of ALFANAR are prohibited from making false or misleading entries in accounting books and records, and from carrying out transactions without a legitimate purpose or that may involve the misuse of funds.

- **Awareness and training:** ALFANAR undertakes to regularly facilitate adequate and appropriate anti-corruption and anti-bribery awareness and training for *Members of the Organisation*, as appropriate to their functions.

¹⁷ **Sponsorship:** the act of supporting or funding an activity, usually for advertising purposes or in return for a benefit. Activities that involve sponsorship include patronage such as offering financial or logistical support for a project or event, or providing products or services.

¹⁸ **Conflict of Interest:** a situation where business, financial, family, political or personal interests could interfere with the judgement of *Members of ALFANAR* during the performance of their obligations to the *Organisation*.

- **Acknowledgement and statement of acceptance:** ALFANAR undertakes to promote the appropriate measures to make this *Policy* available to the *Members of the Organisation*, *Business Partners* and *Third Parties*, so that they are aware of the commitments it contains and declare their compliance to the extent the commitments are applicable to them.
- **Prevention and control:** ALFANAR is committed to implementing procedures and establishing appropriate controls and preventive measures for the identification, evaluation and mitigation of *Corruption* and *Bribery* risks.
- **Complaint:** ALFANAR makes available to *Members of the Organisation*, *Business Partners* and *Third Parties* various reporting and internal communication mechanisms to report practices that violate the law or the ethical and compliance commitments voluntarily assumed by ALFANAR, including this *Policy*.

All *Members of the Organisation* have the obligation to report any behaviour, whether active or by omission, individual or collective in nature, that occurs in the context of ALFANAR's activities and that may be considered irregular conduct or contrary to this *Policy*.

The aforementioned mechanisms form part of the *Internal Reporting System*¹⁹ implemented by ALFANAR and constitute the preferred channel for reporting the aforementioned conduct and for processing any complaints or inquiries submitted.

When handling complaints and queries, the principles and guarantees established in the *Ethics Channel Policy*²⁰ will be respected at all times and diligent processing will be ensured in accordance with the *Ethics Channel Procedure*²¹.

5. DISCIPLINARY SYSTEM

In the event of a failure to comply with this *Policy*, ALFANAR reserves the right to take the disciplinary or contractual measures it deems proportional to the risk or damage caused. These measures may be applied both to those who have directly engaged in misconduct and to those who have not followed the established procedures for its prevention and response, a circumstance that is considered in itself a violation of the values to which ALFANAR is committed.


Disciplinary measures will be adopted in the workplace for *Members of the Organisation* in accordance with current legislation and may range from reprimands to termination of employment, with the employees' legal representatives being notified, if appropriate. In relationships with *Business Partners*, the *Organisation* will take any contractual action it deems appropriate.

When there are clear indications of the possible commission of a crime, the facts will be reported to the competent authorities, along with the information gathered during the internal investigation.

¹⁹ **Internal Reporting System:** set of measures adopted in accordance with Spanish Law 2/2023, of 20 February, regulating the protection of persons who report regulatory violations and corruption (also referred to as the Whistleblower Protection Act), to manage reports relating to violations of the regulations referred to in that body of law.

²⁰ **Ethics Channel Policy:** corporate document that specifies the general principles and guarantees of the *Internal Reporting System* implemented by ALFANAR to report practices contrary to the law, the values or the *Organisation's* internal regulations.

²¹ **Ethics Channel Procedure:** corporate document that regulates the receipt, evaluation, investigation and resolution of information received through the *Internal Reporting System*.

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6. MONITORING AND REVIEW

The *Criminal Compliance Office* is primarily responsible for overseeing the implementation of this *Policy* and for regularly reviewing its content to ensure it reflects the current international recommendations and best practices.

Likewise, the *Criminal Compliance Office* will propose to the *Board of Directors* modifications and updates that contribute to the continuous improvement of the *Policy* and the controls and mechanisms for preventing and combating *Corruption* and *Bribery*, promoting the strengthening of the *Criminal Compliance Model*²².

²² **Criminal Compliance Model:** organisation and management system for crime prevention within ALFANAR.