

PURPOSE

This policy develops the Compliance Policy in relation to corruption offences and aims to prevent individual and organisational conduct and document keeping that may result in offences of this nature in any of the scopes in which the Lontana Group performs its activities both in Spain and abroad. It applies to:

- All Lontana Group companies, in addition to its subsidiaries and investee companies over which the company has effective control or occupies positions on its governing bodies.
- All corporate levels, including the ownership, Board of Directors, management committee, directors, control bodies and all staff.

WHAT IS OUR AIM?

Guarantee that all levels of the Lontana Group ensure the actual, effective application of anti-corruption measures, in such a way that any conduct that may place the Group, its assets or its reputation, its employees and other stakeholders at risk does not occur and is not tolerated.

Adapt our anti-corruption management approach to the legal and regulatory requirements in force, in addition to those in relation to criminal responsibility prevention and control, all in line with its interpretation of the corresponding case law.

Extend this policy to any public or private relationship that the Lontana Group establishes and in any geographical area, both locally and internationally, seeking to ensure the participation of its suppliers and customers, and other stakeholders, in its enforcement.

HOW?

Effectively establishing and applying all financial and non-financial controls and procedures necessary to avoid corrupt practices, under the direct supervision of the Group's governing and management bodies.

Basing our relationships on the principles of transparency, free competition and equal opportunities, refraining from participating in any actions aimed at obtaining an advantage on the market or in customer or supplier contracts using unlawful practices. All the foregoing applied to local and international markets, relationships with its customer, suppliers, competitors, the public sector and any governments.

Refraining from offering or favouring public servants or people in positions with decision-making power, whether directors or not, at other companies in the form of money or any

other economic or equity benefits aimed at obtaining any type of advantage on behalf of the Group.

Avoiding conflicts of interests at a Group-wide level. A conflict of interest is considered as any situation in which a business action or decision is based purely in the pure personal interest of the person or people from the company who are participating in it, or of third parties with whom they have a personal connection, with no consideration for the general interests of the group, is prohibited.

Respecting, at all times, supplier selection procedures, in such a way that as part of procurement, measures can be adopted to ensure that a supplier complies to an adequate level as part of its activities.

Limiting, insofar as possible, the use of cash in payments made by the company. When necessary, a detailed record will be kept of payments made and the record will indicate the amount paid, the reference, the payment date and the beneficiary.

Applying a protocol to verify the actual destination of funds before performing any of the following activities:

1. Donation to an NGO.
2. Participation in an individual or group financing project, including micro-financing.
3. Participation in a sponsorship project.
4. Participation in a trusteeship project.
5. Organisation or sponsorship of an event.
6. Invitation to or funding the costs of attending an event.
7. Participation in any other welfare, cultural, scientific, charity, sporting or similar project.

Following a specific procedure when making payments to natural or legal persons other than those appearing in an invoice.

Including a section on corruption in the due diligence performed by the Group before a merger or acquisition [with the exception of intra-Group transactions] and taking the same precautions before formally entering into a collaboration agreement, joint venture or temporary union of businesses.

**It is EVERYBODY's mission to ensure transparency,
free competition and equal opportunities.**