



ANTICORRUPTION CODE



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1 INTRODUCTION

Grupo IGNIS (or the “Company”) undertakes to carry out all aspects of its activity fulfilling the highest legal and ethical standards. To this end the Company has implemented this Anticorruption Code (hereinafter the “Code”) as way to prevent bribes, avoid irregular conducts and allow Grupo IGNIS to respond swiftly and efficiently to any information requested about its behaviour.

This Code is conceived on the grounds of the mission, vision and values of the Company and aligns with the rest of policies and internal codes of Grupo IGNIS.

All employees, managers, directors of Grupo IGNIS or anyone acting in its name and in general, any member of Grupo IGNIS (hereinafter, the “Employees” or in singular the “Employee”) will adhere to the Code and all other policies and internal codes previously approved by the Company for the sake of avoiding and detecting the commission of any unlawful act.

Grupo IGNIS shall make available for all Employees this Code which shall be subject to the necessary actions for its communication, implementation, training and awareness.

2 SCOPE OF APPLICATION

The Code is addressed to Employees who exercise their activities regardless of their type of contract defining their professional and/or employment relationship or of the place where they carry out such activity.

Compliance with this Code is mandatory for all Employees and its observance does not exempt from the fulfilment of all other standards to be applied pursuant to the current legislation of the areas where Grupo IGNIS operates.

Provisions contained in this Code and in other Group policies are subject to the regulations governing each country. Should there be any discrepancy between this Code and other Group policies and the regulations governing each area this issue shall be referred to the Compliance Officer of Grupo IGNIS.



3 GENERAL PRINCIPLE OF CONDUCT

Employees in the development of their activity shall fulfil the provisions of the Code, EU legislation and anticorruption legislation applicable acting always as honestly, transparently and loyally as possible and in compliance with the highest ethic, corporate and legal standards.

Pursuant to the provisions of this Code, Employees by themselves or through third parties shall not:

- Promise, offer or deliver any undue benefit or advantage to any public official or third party with whom they have or may have a commercial relationship in order to unduly obtain or maintain a commercial advantage.
- Receive, request or accept any undue benefit or advantage as compensation from a third party this being an individual or public or private entity to unduly favour it with an advantage.

Should any Employee be aware or suspect of any actual or potential conduct included in the list above by another Employee or a commercial partner of Grupo IGNIS, the latter shall inform the Compliance Officer without delay.

4 GUIDELINES FOR ACTION IN SPECIAL SITUATIONS

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| <i>Gifts</i> | <p>✓ It is forbidden:</p> <ul style="list-style-type: none"> • To offer, promote or make gifts which may be beyond the mere courtesy. Gifts may be offered if: <ul style="list-style-type: none"> ○ It is allowed pursuant to the applicable legislation and the guidelines of the employer making the gift. ○ It is offered openly and with total transparency as a sign of esteem, courtesy or hospitality and follows local customs. ○ Its objective is not to obtain an undue benefit or advantage. ○ Its value is under €150. However this value may vary depending on the legal system and the country where the gift, present or favour is made. <p>In order to make gifts which do not follow the previous guidelines, please confirm with the Compliance Officer.</p> |
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| | <ul style="list-style-type: none">✓ The provisions above shall apply even though expenses are directly assumed by the Employee without allocating them to Grupo IGNIS or if they are assumed directly or indirectly by Grupo IGNIS.✓ Employees shall neither accept nor allow their first degree relatives to accept gifts, presents or favour from any client, supplier or other third parties making or wishing to make business with Grupo IGNIS unless for objects with little value and insofar as the purpose of such gift, present or favour is not to obtain an undue advantage or benefit. Any gift not fulfilling the requirements mentioned has to be returned immediately and the Employee shall inform the Compliance Officer as soon as possible. If the immediate return is not possible, gifts shall be given to Grupo IGNIS for social purposes. |
| <p><i>Meals, leisure, trips and lodging</i></p> | <ul style="list-style-type: none">✓ Employees following the provisions of the Policy on Business trips and Expenses for Employees of Grupo IGNIS and applying a criterion of prudence and moderation shall only offer or receive invitations to activities or entertainment events from people doing business with Grupo IGNIS if such invitation is occasional, reasonable and is not aimed at obtaining any kind of commercial or professional advantage under the following criteria:<ul style="list-style-type: none">• Meals, entertainment, transfers, trips and lodging shall never be offered as a way to influence in commercial decisions of another person.• The suitability of a meal, entertainment, transfer, travel and lodging depends on the reasonableness of the expense it represents and the type of activity involved in attention to specific circumstances.• Expenses made in good faith and not related to the intention of obtaining a commercial or professional advantage.• The value is under €150 per person. This value may vary depending on the legal system and the country where the gift, present or favour is made. <p>The abovementioned will be applicable regardless of the Employee directly assuming the expenses and not been allocated to Grupo IGNIS or if they are directly or indirectly assumed by Grupo IGNIS.</p> <ul style="list-style-type: none">✓ No allowances to public officials or other individuals with the power of deciding or influencing in commercial activities of Grupo IGNIS shall be paid.✓ The <i>Compliance Officer</i> shall approve before any meal, entertainment, transfer or lodging offered or received from a third party not meeting the conditions described in the sections |



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| | <p>above. This value may vary depending on the legal system and country where it is made.</p> <ul style="list-style-type: none">✓ Meals, entertainment, lodging and transfers offered to third parties shall be considered gifts and will be subject to the requirements and standards envisaged in this Code even when no Employee of Grupo IGNIS attends. |
| <i>Work positions and internships</i> | <ul style="list-style-type: none">✓ Offering internships or a work position to public officials, commercial partners or their relatives or friends insofar as it is intended to obtain a commercial benefit from Grupo IGNIS. |
| <i>Charitable donations and sponsorships</i> | <ul style="list-style-type: none">✓ It is forbidden to make charitable donations or sponsorships if their purpose is to do business, maintain the existing ones or acquire an undue commercial advantage.✓ It is expressly forbidden to make any donation, direct or indirect, to political parties.✓ Any charitable donation or sponsorship of Grupo IGNIS shall:<ul style="list-style-type: none">• Be allowed by the law and be acceptable in virtue of the provisions of this Code.• Be made to a duly authorized official organization.• Be notified and have the prior authorization of the <i>Compliance Officer</i>.• Be accounted for and registered transparently. |
| <i>Relations with third parties</i> | <ul style="list-style-type: none">✓ Indirect payments made through third parties even the offer of any undue benefit or advantage to a third party knowing that it will be given to a public official or other private entity with undue purposes is forbidden.✓ Employees shall avoid those situations involving third parties which may represent a breach of this Code.✓ Employees dealing with third parties are responsible for taking reasonable care to guarantee that such third parties carry out their activity ethically and in compliance with this Code. As per third parties representing Grupo IGNIS before institutions, such care involves:<ul style="list-style-type: none">• A research (<i>due diligence</i>) on the integrity of the third party.• The inclusion in the contract signed with provisions guaranteeing the fulfilment by the third party of anticorruption obligations.• To request the third party to certify that it has not breached and shall not breach the Code of Conduct for Suppliers of the Company or any other anticorruption law applicable while it is carrying out business in the name and representation of |



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| | <p>Grupo IGNIS.</p> <ul style="list-style-type: none">• The supervision of the reasonableness and legitimacy of the services provided by the third party as well as the remuneration paid during the contractual relation these being modified if reasonably necessary.• To be aware for potential actions or facts of third parties that warn of a potential existence of an irregular conduct included in this Code such as:<ul style="list-style-type: none">○ Unusual or excessive payment requests.○ Payment requests to an account based in a country different from that where the third party is located or is working for Grupo IGNIS.○ Payment requests to other third parties to an encrypted bank account in cash or by any other payment mean that cannot be traced.○ Requests for charitable donations.○ The third party is professionally or commercially related to a public official or has a close relationship. |
| <p><i>Expenses control and registry</i></p> | <ul style="list-style-type: none">✓ All expenses mentioned herein in which Grupo IGNIS may incur either by itself or through its Employees may be registered accurately in the internal registries of the Company for such purpose. Therefore, Employees shall:<ul style="list-style-type: none">• Meet the principles, laws and practices applicable on accounting and financial information.• Duly and accurately prepare all reports and registries the Management of Grupo IGNIS may request.• Make sure that all transactions made, payments to third parties and payments involving funds or assets of Grupo IGNIS are properly and accurately registered.• Avoid the opening of secret and not registered bank accounts for any purpose.• Avoid the creation of false or inaccurate entries in books and accounting and financing registries of Grupo IGNIS.• Avoid the use of personal funds to accomplish what is herein forbidden.✓ Grupo IGNIS shall carry out periodical audits of its books and accounting and financial registries to supervise compliance with the Code. |



5 COMPLIANCE WITH THE CODE

Employees in the development of their duties shall not only strive to act according to the law but also what is in accordance with the corporate social responsibility of Grupo IGNIS in order to ensure that the principles and standards set out in this Code govern the overall operations and day-to-day running of the Company.

The Company shall implement all resources necessary for everyone to whom this Code applies, to act always honourably assuming the following responsibilities

- Reading, knowing and understanding this Code as well as the rest of policies, principles and procedures of Grupo IGNIS aimed at developing their commitments in order to guarantee their adherence to all requirements.
- Meeting each and all of the aspects included in the Code, policies, principles and procedures of Grupo IGNIS.
- Ensuring that all collaborators affected by this Code and other policies, principles and procedures of Grupo IGNIS undertake and fulfil it.
- Demonstrating in day to day activities the commitment with the principles of the Code and other policies and procedures of Grupo IGNIS as well as setting an example for the rest of collaborators.
- Avoiding any situation which may give rise to illegal practices or inconsistent with the basic principles of action contained in this Code.
- Collaborating with compliance and audit bodies providing the information requested and being faithful to reality.
- Checking with the Compliance Officer and the Sustainability Area in case of doubts with respect to the actions to be taken pursuant to the provisions of this Code and other policies, principles and procedures of Grupo IGNIS.
- Communicating any incidence arising from the knowledge or suspicion of breach of this Code and other policies, principles and procedures of Grupo IGNIS.

The breach of the provisions in the Code may be the object of legal actions. In the event of breach of the provisions of the Code, the Company and its Employees shall react immediately subject to the framework allowed by the regulation to be applied, implementing all legitimate measures applicable.



The response will be consistent with the seriousness of the facts regardless of the hierarchy of the people involved.

6 QUERIES AND COMPLAINTS

Grupo IGNIS makes available for all Employees as well as for third parties the Internal Information System (hereinafter the “Whistleblowing Channel” for its Spanish initials) for any party interested in reporting incidents, queries, doubts or complaints regarding the breach of the commitments of this Code as well as all other internal and external regulations applicable.

The Whistleblowing Channel is available on Grupo IGNIS corporate website for its use by all those Employees and third parties that require it.

Any Employee who is aware or has reasons to strongly suspect of a breach of this Protocol or of conducts or acts contrary to the legal system shall contact through the Whistleblowing Channel with the Compliance Officer immediately.

The Whistleblowing Channel of Grupo IGNIS fulfils all demands and guarantees provided for Law 2/2023, of February 20, regulating the protection of persons who report regulatory violations and the fight against corruption, guaranteeing:

- Confidentiality of information.
- Lack of retaliation against the informant.
- Integrity of the traceability and management of complaints and/or queries made in good faith.

The Compliance Officer shall initiate an investigation in case of detection of signs of an irregularity provided for in the Code and/or in the applicable legislation and shall notify the beginning of such investigation to the informant and if applicable, the person denounced.



7 APPROVAL AND OPERATION OF THE CODE

This Code is an adaptation of the Code approved on 12 November 2021 which it supersedes and has been approved by the Board of Directors of Grupo IGNIS on July 6th 2023.

Since its approval the Code is included in the regulations of Grupo IGNIS being in force until its annulment, revoke or update.

The Code is subject to periodical revision and update processes in order to adjust it to the applicable regulations from time to time, to the social and professional reality and context of the Company.

In the event of any update of the Code the interested parties will be timely informed using the communication mechanisms provided for by Grupo IGNIS.