



# **ANTITRUST POLICY**



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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 Antitrust Policy (hereinafter the “Policy”) as way to detect and prevent the commission of any act in breach of antitrust law.

This Policy 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 Policy 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.

The Policy aims to maintain the Company's effective competition in the markets in which it participates.

The Policy will be made available by the Company to all Employees and will be subject to the necessary actions for communication, implementation, training and awareness-raising.

## 2 SCOPE OF APPLICATION

The Policy 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, as well as business partners and third parties with whom Grupo IGNIS's employees interact.

Compliance with this Policy 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 Policy and in other Group policies are subject to the regulations governing each country. Should there be any discrepancy between this Policy and other Group policies and the regulations governing each area the issue shall be referred to the Supervisory and Surveillance Body or the Area of Sustainability and Compliance of Grupo IGNIS .



### 3 PRINCIPLES OF ACTION

Grupo IGNIS's actions shall be governed, within the framework of the defence of antitrust law, by the following principles:

- Compete in the markets in a **fair and transparent** manner.
- Create a **culture based on compliance with antitrust rules** through the distribution of policies and training to employees.
- Establish, in **areas where there is a higher risk** of infringement of competition rules, specific procedures for action.
- **Avoid** any contact with competitors aimed at **collusive behaviour** such as price fixing or market sharing.
- **Report to the Sustainability and Compliance area any incitement** by a third party to commit the aforementioned actions in order to determine the procedure to be followed in accordance with the applicable regulations.
- **Do not exchange confidential information** with competitors that could give rise to anti-competitive practices.
- In the event that any Grupo IGNIS company has a **dominant position** in any of the markets in which it operates, **guidelines** will be established to avoid abusive conditions.
- To **collaborate diligently with the competition authorities** in the exercise of their functions.

In order to guarantee the defence of antitrust, the following prohibited conducts are established:

- **Collusive conduct**, understood as any collective agreement, decision or recommendation, or concerted or consciously parallel practice, which has as its object, produces or may produce the effect of preventing, restricting or distorting competition in all or part of the national market.
- **Abuse of a dominant position**, which results in the abusive exploitation by one or more undertakings of their dominant position in all or part of the national market.
- **Distortion of free competition** by unfair acts.

The conducts indicated in this section shall be interpreted in accordance with the provisions of Law 15/2007, of 3 July, on the Defence of Competition.

To ensure regulatory compliance with this Policy, employees shall:



- Not share information regarding prices, markets, suppliers or strategies with third parties.
- Maintain discretion in business association meetings, forums, congresses and other industry meetings with respect to confidential company information.
- Ensure regulatory compliance when participating in public tenders, Temporary Joint Ventures (UTES) and other forms of business collaboration.
- Ensure compliance with the obligation to notify the competent authorities in accordance with the legal requirements in force before proceeding with any concentration.

## 4 COMPLIANCE WITH THE POLICY

Employees in the development of their duties shall strive to act according to the law but also to do so according to the social corporate responsibility of Grupo IGNIS in order to guarantee that the principles and standards included in this Policy govern the normal operation of the Company.

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

- Reading, knowing and understanding this Policy 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 of the aspects mentioned in the Policy and in other codes, policies, principles and procedures of Grupo IGNIS.
- Ensure that Business partners and other collaborators affected by this Policy and other codes, policies, principles and procedures of Grupo IGNIS undertake and fulfil them.
- Demonstrating in day to day activities the commitment with the principles of the Policy 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 Policy.



- Collaborating with compliance and audit bodies providing the information requested and being faithful to reality.
- Checking with the Supervisory and Surveillance Body and the Sustainability and Compliance Area in case of doubts with respect to the actions to be taken pursuant to the provisions of this Policy and other policies, principles and procedures of Grupo IGNIS.
- Communicating any incidence arising from the knowledge or suspicion of breach of this Policy and other policies, principles and procedures of Grupo IGNIS using the Queries and Complaints Channel.

The breach of the provisions in the Policy may be the object of legal actions. In the event of breach of the provisions of the Policy, 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.

## 5 QUERIES AND COMPLAINTS

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

The QCC 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 Policy or of conducts or acts contrary to the legal system shall contact through the QCC with the Supervisory and Surveillance Body immediately.

The QCC 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 Supervisory and Surveillance Body shall initiate an investigation in case of detection of signs of an irregularity provided for in the Policy and/or in the applicable legislation and shall notify the beginning of such investigation to the informant and if applicable, the person denounced.

## **6 APPROVAL AND OPERATION OF THE POLICY**

This Policy has been approved by the Board of Directors of Grupo IGNIS on **XXX**.

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

The Policy 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 Policy the interested parties will be timely informed using the communication mechanisms provided for by Grupo IGNIS.