



Complex made simple

VASS Group Anti-Bribery & Anti- Corruption Policy

V1

2021



Change control

Fecha	Versión	Autor	Revisor	Descripción	Apartado	Aprobador
01/09/2021	1.0	Juan Mazarredo (KPMG)	Jeannette Contreras	First versión	Todos	Javier Latasa

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VASS Madrid

CMMI-DEV v2.0 (Staged): Maturity Level, Web Portal Development Projects

UNE-EN ISO 9001:2015 Design, development and implementation of web portals and platforms to support business processes and document management

UNE-EN ISO 14001:2015 Design, development and implementation of web portals and platforms to support business processes and document management.

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1. Scope

1. This Policy applies to all employees of VASS Group in all subsidiaries, affiliates and offices spread around the world, as well as to certain agents, consultants or other third parties that VASS Group hires to act on its behalf. Reiterates the company's zero tolerance policy against bribery and corruption, establishes the company's standards for complying with applicable anti-corruption laws, and identifies legal and compliance officials from whom certain approvals must be obtained and with whom certain approvals can be obtained. ask questions about this Policy.

2. Designated Compliance Personnel

2. For each VASS Group line of business certain personnel have received specialized training on the anti-corruption laws of the countries and businesses for which they have legal and/or compliance responsibilities. These personnel have been given the responsibility for advising employees on anti-bribery and anti-corruption issues, clearing expenses involving government officials and approving the engagement of certain agents and consultants. All of these procedures are described in the following sections of this Policy.

3. The individuals with these anti-corruption compliance responsibilities are referred to in this Policy as Compliance Personnel, and are identified in Attachment A. The Chief Compliance Officer of VASS Group is Mrs. Jeannette Contreras and she may be reached through email direction: jeannette.contreras@vass.es or on mobile phone: +34 610 274 575.

4. Likewise, the VASS Group is currently carrying out the necessary tasks to establish a Whistleblower Channel through which the employees of the VASS Group or any interested third party can report possible irregularities regarding, among other issues, corruption and bribery (<https://channel.globalsuitesolutions.com/vass>)

¹ Anti-Bribery and Anti-Corruption law and regulation applicable to VASS Group base in Spain and active in multiple jurisdiction might include Código Penal and complementary regulations (Spain), FCPA (US), UK Bribery Act (UK), OECD Recommendations, United Nations Convention against Corruption (UNCAC) and European Union Convention on the fight against corruption involving public officials.

3. Corruption prohibited

5. VASS Group has zero tolerance for bribery and corruption. No employee may directly or indirectly offer, promise, grant or authorize the giving of money or anything else of value to a government official or to a representative of a non-government-owned commercial entity to influence commercial action or obtain an improper advantage. Any offer, promise, grant or gift must comply with applicable laws and with this Policy, and must not create the appearance of impropriety. This means that no such offer, promise, grant or gift may be made if it could reasonably be understood as an effort to influence improperly a government official or representative of a non-government-owned commercial entity to grant VASS Group a business advantage.

6. Where the recipient is a government official (as defined in Section 4), such conduct is universally prohibited by law as criminal bribery. Even where the recipient is not a government official, but is acting in a purely private commercial capacity, the laws of several countries, including Spain, United Kingdom, and, among others, U.S. make such conduct a crime. The potential criminal penalties, both for the company and for individuals, are severe. Putting aside the possibility of criminal actions against the company or its employees, all employees guilty of a violation will be subject to disciplinary consequences, up to and including dismissal.

7. It is important to remember that the definition of a “bribe” is broader than the payment or offer of money; it can include the offer or gift of anything of value, such as, under certain circumstances:

- Gifts;
- Hospitality, such as meals or entertainment;
- Travel, or reimbursement of travel-related expenses;
- Favoring relatives or business partners in employment with VASS Group;
- Charitable or political contributions;
- Personal advice or assistance;
- Attendance at a conference hosted or paid for by VASS Group;
- Attendance at training sessions provided by VASS Group;

8. It makes no difference whether anything is actually given or received or whether the person to whom it is offered actually does anything in return; merely offering or authorizing someone else to offer a bribe is prohibited. It also does not matter whether

the person to whom the benefit is offered, promised or given is the same person as the public or corporate official or other person who is intended to perform their function improperly or otherwise misuse their position. For example, it would be improper to offer employment to a government official's relative, or make a contribution to a charity recommended by the official, with the understanding that the official would as a result offer a business advantage to VASS Group.

9. In addition, the Policy prohibits indirect payments to government officials if the circumstances indicate that any benefit from the payment or gift may possibly be passed on to a government official either to influence official action or to gain an improper advantage. The same is true if any benefit from the payment or gift may possibly be passed on to a representative of a non-government-owned commercial entity in consideration for an improper advantage in a business transaction. This would include payments to consultants, agents, intermediaries, business partners, or other third parties, including family members of the government official or otherwise apparently unrelated individuals or corporate entities of any type.

10. As a general rule, expenses will not be paid for the benefit of friends or family members of government officials or key business decision makers of a non-government-owned commercial entity. Limited exceptions, under appropriate circumstances and following close scrutiny and approval by the Compliance Officer, could include, for example, payment of expenses for a government official's spouse or partner to attend a cocktail party or dinner hosted by VASS Group, where it would be awkward or impossible for the official to attend alone.

11. Additionally, it is a general rule that side trips to vacation sites or other non-business-related locales will not be approved. Side trips are different from "entertainment," and to determine whether a proposed event is "entertainment" or a "side trip" requires VASS Group approvers to consider the relationship between the various components of an expense in sum

12. The hiring of relatives of, and persons referred by, government officials or key business decision makers of a non-government-owned commercial entity, is a recurring risk area under anti-corruption laws. This Policy does not prohibit the hiring of qualified personnel, but special care must be taken in the case of individuals who are relatives of, or persons referred by, government officials. A process for vetting such candidates (which includes Due Diligence procedures) is set forth at Attachment B.

4. Bribery of a Government Official

13. Every country where VASS Group does business has laws prohibiting the bribery of its government officials. In this context, a bribe can include offering or providing to a government official some benefit for the purpose of influencing the official to grant an advantage, usually an advantage within the scope of the official's government duties. If the intent is to obtain something from the official in exchange for providing the official with the benefit, it will not matter that the advantage conveyed by the official is something the official may otherwise have done in any event. These offenses are extremely serious and involve high risk not only to VASS Group, but also carry serious criminal penalties for individuals. Consequently, in addition to prohibiting such conduct, VASS Group maintains special procedures relating to government officials.

4.1. U.S. Public Officials

14. VASS Group has established procedures and guidelines to deal specifically with U.S. public officials because, in addition to anti-corruption laws, various lobbying and other domestic laws in the United States contain flat prohibitions and specific dollar limits on gifts and entertainment expenses. All issues relating to gifts or expenses for U.S. federal, state or municipal government officials, including the pre-clearance of such expenses, are governed, described. In order to analyze and verify the origin and legitimacy of potential gifts / payments made in favor of a U.S. public official, VASS Group has established a committee for the approval of said expenses, which will be made up of the Compliance Officer and by those responsible for compliance in the different areas of the VASS Group.

4.2. All Government Officials

4.2.1. Who is a Government Official?

15. A government official is anyone who is employed by a government agency, or government controlled corporation (including a sovereign wealth fund), or public international organization.

16. A government official in this context is also anyone who is serving in an official or representative capacity for any government, whether actually employed by that government or not. Care must be taken in countries with government-managed

economies (e.g. The People’s Republic of China or Vietnam), given that corporate officials in such countries may be government officials even when performing what in other countries may be considered private roles.

17. Officials of political parties and candidates for political office and legislative, administrative or judicial officials, regardless of whether they are elected or appointed, as well as political parties themselves, are also considered government officials for the purposes of this Policy. If in doubt, VASS Group employees should consult with the company’s Compliance Personnel.

4.2.2. What must be Pre-cleared?

18. The law requires that VASS Group maintain strong internal controls around the payment of expenses related to government officials, as defined above.

19. VASS Group employees must pre-clear incurring any offer, payment or provision of anything of value to a government official exceeding than [30] EUR in a single year, or such other lower limit as has been set by the company’s Chief Compliance Officer, including:

- Hospitality, travel and related expenses (such as airlines, hotels, meals, entertainment and other expenses) for a government official, including but not limited to traveling to visit VASS Group facilities and meet VASS Group staff, or to participate in a trip or meeting to market a transaction involving the agency or government which employs the official, or to attend a conference, seminar or symposium organized or sponsored by VASS Group, or attend a VASS Group training session or other meeting
- Contributions to a charity or other philanthropic organization recommended by, or that would benefit, a government official
- Any offer of VASS Group employment to any person upon the recommendation of a government official (see Attachment B – Questionnaire Regarding Potential Referred Hire)
- Gifts provided to a government official

20. Pre-clearance does not need to be obtained for reasonable expenses incurred for meals and entertainment of government officials if impracticable due to the event’s timing or some other unforeseen circumstance. For example, a spur-of-the-moment

opportunity to dine with a government official might make pre-clearance impossible. Under such circumstances, employees should consider carefully that non-pre-cleared events of this type expose the company to greater risk than pre-cleared events, and that the decision will be closely reviewed. As outlined below in section 4.2.3, the expense must be submitted for approval, and the reason why pre-clearance was not obtained must be clearly documented.

21. Transparency represents the company's best defense to a legal challenge regarding any particular expenditure related to a government official. All expenses requiring pre-clearance under the Policy should be supported by a clear and valid business purpose related to promoting, demonstrating, or explaining VASS Group products or services, or executing or performing a contract. Likewise, expenses must be reasonable given their underlying business purpose.

22. In general, transparently documented reasonable and bona fide expenses related to the promotion, demonstration or explanation of a VASS Group product or service are unlikely to pose corruption risk. On the other hand, the more lavish the expense, the easier it would be for authorities to infer corrupt intent on the part of VASS Group or the individual employee making the payment.

23. Of course, whether or not pre-clearance is required, no payment, gift or expense reimbursement is permitted which fails to conform to the standards set forth in this Policy, i.e., that is lavish or otherwise inappropriate, such that it is intended to, or is reasonably likely to be perceived as intended to, cause the recipient to act improperly.

4.2.3. Pre-clearance Process

24. Any employee who intends to make any payment, gift or reimburse an expense incurred by a government official for which pre-clearance is required, or who has incurred an expense without obtaining pre-clearance as permitted in section 4.2.2, must complete an approval request and send it for approval to the office of the Chief Compliance Officer.

4.2.4. Facilitation Payments

25. This Policy prohibits facilitation payments of any kind. A facilitation payment is a payment or gift given to a government official to cause the official to perform a routine duty or function, or to expedite such performance. Irrespective of how common such payments may be according to local custom in any relevant jurisdiction, such payments

are prohibited by this Policy. Payments offered to facilitate passage through customs, or to obtain quicker service from a government official, are considered facilitation payments.

4.2.5. Extortion to governments officials

26. Extortion of a public official occurs when an employee of the VASS Group coerces a public official to perform an act contrary to his will in order to obtain some benefit for the VASS Group. Extortion can also include demands for payment or delivery of other valuable property that may be accompanied by an unlawful threat to a person's personal safety or freedom of movement. It may also include the threat to intentionally refuse to perform or delay the performance of certain routine tasks that would cause a third party to suffer financial hardship or loss.

27. Extortion can also come from a public official, being the public official who makes a demand for payment or the delivery of other valuable goods to an employee of VASS Group in exchange for taking or stopping certain actions that could result in a profit or loss for the VASS Group.

28. In the absence of unusual circumstances, such as when the personal safety or freedom of movement of a Grupo VASS employee or a member of their family is at risk, Grupo VASS will not agree to make extortion payments of any kind. In any case, all potential situations of extortion to or by public officials must be reported to the Chief Compliance Officer.

4.2.6. Cash Disbursements

29. As a general rule, no payments of any kind, including per diem or petty cash disbursements, should be made directly to a government official. Apart from reasonable expenses of the kind described herein, VASS Group must not compensate a government official for travel or otherwise. If travel reimbursements are required, payments should be made to the government official's agency, not directly to the official. Receipts must be collected and documented at VASS Group.

4.2.7. Conflict of Interest with governments official

30. Conflict of interest occurs in relation to a public official when there is a relationship between a VASS Group employee and a public official, for which the third party's judgment, in relation to a primary interest for him/her, and the integrity of their actions are unduly influenced by a secondary interest, which is often financial or personal.

31. Situations of conflict of interest with public officials are not strictly prohibited but must be duly reported and notified to the Compliance Officer of VASS Group so that a situation in which a public official benefits in any way cannot occur or appear to occur to VASS Group

5. Comercial Bribery

32. This Policy prohibits commercial bribery, in addition to bribery of government officials. A commercial bribe occurs when a person confers, or offers or agrees to confer, any benefit upon the recipient with the intent to influence improperly the recipient's conduct in relation to their employer's business affairs. The influence would be improper where intended to cause the recipient to breach an expectation that the recipient will act in good faith, or with impartiality, or consistently with their fiduciary duties, or where the receipt of the benefit is itself otherwise improper under some requirement (legal or otherwise) applicable to that person. This means that no such offer, promise, grant or gift may be made if it could reasonably be understood as an effort to influence improperly a representative of a non-government-owned commercial entity to grant VASS Group a business advantage. Likewise, it would be improper for any employee of VASS Group to solicit or accept such a benefit.

33. As noted above, in certain jurisdictions, such as Spain and U.K., commercial bribery is a crime. As with bribery of government officials, in commercial bribery it does not matter if any payment or benefit is actually made or received, or if anything is actually done by the recipient; it is improper simply to offer or to solicit such a payment or benefit. It also does not matter whether the person to whom the benefit is offered, promised or given is the same person as the person who is to perform improperly the relevant function.

5.1. Receiving a Bribe

34. This Policy prohibits all VASS Group employees from using their positions to solicit, demand, accept, obtain or be promised advantages. Such conduct would violate this Policy and could also violate criminal law. For that reason, VASS Group employees may not request or receive from outside VASS Group anything of value from another company or individual in the course of their employment and which may affect, or have the appearance of affecting, the performance of that employment.

35. Reciprocity in the payment of meals, taxis and other minor expenses by a third party with whom Grupo VASS maintains a business relationship is not be prohibited, but at the moment when the total amount of expenses paid by the same third party exceeds [30] EUR per year, the VASS Group employee must refuse the payment of these expenses. Potential doubts that may arise in this regard will be referred to the Chief Compliance Officer.

5.2. Paying a Bribe

36. This Policy also prohibits VASS Group employees from paying bribes, not just to government officials, but also to representatives of private customers, suppliers, and other counter-parties. Employees are prohibited from offering or providing a benefit that is lavish or otherwise inappropriate to someone, such that it is intended to, or is reasonably likely to be perceived as intended to, cause the recipient to act improperly, as this Policy describes above.

37. VASS Group employees must pre-clear incurring any offer, payment or provision of anything of value to a representative of a non-government-owned commercial entity exceeding than [30] EUR in a single year, or such other lower limit as has been set by the company's Chief Compliance Officer, including:

- Hospitality, travel and related expenses (such as airlines, hotels, meals, entertainment and other expenses) for a representative of a non-government-owned commercial entity, including but not limited to traveling to visit VASS Group facilities and meet VASS Group staff, or to participate in a trip or meeting to market a transaction involving the agency or government which employs the official, or to attend a conference, seminar or symposium organized or sponsored by VASS Group, or attend a VASS Group training session or other meeting.

- Contributions to a charity or other philanthropic organization recommended by, or that would benefit, a representative of a non-government-owned commercial entity.
- Any offer of VASS Group employment to any person upon the recommendation of a representative of a non-government-owned commercial entity (see Attachment B – Questionnaire Regarding Potential Referred Hire).
- Gifts provided to a representative of a non-government-owned commercial entity.

5.3. Commercial Extortion Payments

38. Commercial Extortion occurs when an employee of the VASS Group coerces a representative of a non-government-owned commercial entity to perform an act contrary to his will in order to obtain some benefit for the VASS Group. Extortion can also include demands for payment or delivery of other valuable property that may be accompanied by an unlawful threat to a person's personal safety or freedom of movement. It may also include the threat to intentionally refuse to perform or delay the performance of certain routine tasks that would cause a third party to suffer financial hardship or loss.

39. This type of extortion can also come from a representative of a non-government-owned commercial entity, being the third party who makes a demand for payment or the delivery of other valuable goods to an employee of VASS Group in exchange for taking or stopping certain actions that could result in a profit or loss for the VASS Group.

40. In the absence of unusual circumstances, such as when the personal safety or freedom of movement of a Grupo VASS employee or a member of their family is at risk, Grupo VASS will not agree to make extortion payments of any kind. In any case, all potential situations of extortion to or by representative of a non-government-owned commercial entity must be reported to the Chief Compliance Officer.

5.4. Conflict of interest with non-government officials

41. In a similar way to what is detailed above in relation to public officials, Conflict of interest occurs in relation to a business decision makers when there is a relationship between a VASS Group employee and a key business decision makers, for which the third party's judgment, in relation to a primary interest for him or her, and the integrity of

his or her actions, are unduly influenced by a secondary interest, which is often financial or personal.

42. Situations of conflict of interest with public officials are not strictly prohibited but must not be duly reported and notified to the Compliance Officer of the VASS Group so that a situation in which a public official benefits in any way cannot occur or appear to occur. to VASS Group.

6. Third Parties assisting in business development

43. No individual or entity may be hired to commit bribery on behalf of VASS Group. Special care must be taken when VASS Group engages the services of an agent, consultant or other third party, especially when the third party is expected to help develop business with potential clients (whether government-owned or non-governmental), or when the third party participates in seeking or obtaining any government approval. The scope of the Policy covers any third party acting for and on behalf of the VASS Group, including in connection with a single transaction that is the subject of the agreement. All VASS Group employees must take steps to ensure that third parties fully comply with applicable anti-corruption laws and VASS Group policies. Attorneys, public relations consultants, accountants, and other third parties are also covered by this policy.

44. Before establishing relationships with third parties, VASS Group must perform external due diligence procedures in order to carry out a reputational analysis of potential third parties with whom VASS Group intends to maintain relationships (see more details on Section 6.1.). These due diligence procedures may be simplified or reinforced depending on the characteristics of the third parties to be hired by VASS Group. In this regard, and in the case of hiring third parties to assist VASS Group in developing business in international subsidiaries (e.g. LATAM), due diligence procedures must always be reinforced.

45. In this regard, any payment to a third party or consultant who will carry out business development work on behalf of or on behalf of the VASS Group that exceeds an amount of [30] EUR (including a series of payments totaling [30] EUR or more relating to a single transaction) must be approved by the VASS Group Chief Compliance Officer.

6.1 Pre-hire Due Diligence Required

46. Before hiring a third party, the employee proposing the engagement must confer with the Chief Compliance Officer or his or her designee to determine the due diligence procedures to be performed (enhanced or simplified). This may include, as considered appropriate by the Chief Compliance Officer or his or her designee, the engagement of internal or external investigators or other providers of due diligence information or intelligence services.

47. The employee must complete and deliver to the Chief Compliance Officer or his or her designee an Engagement Form attached as Attachment C to this Policy that includes certain information about the proposed third party, reflects the due diligence procedures performed, and describes, among other things, the particular reason of the engagement, the current or previous relationship of the proposed third party with officers or officials of relevant potential customers, who (if anyone) recommended the engagement of the third party, justification for the proposed fee and explanation of the arrangements for payment. The proposed agent or consultant must meet (in person or by phone) with the Chief Compliance Officer or designee, and the engagement must be approved by that person.

48. Third parties engagements involved in the business development of VASS Group which were already in existence when this Policy became effective should be promptly reviewed consistently with the foregoing process and be brought into compliance within [6] months.

6.2. Certain third parties prohibited

49. No third party should be proposed for consideration if:

- the Third Party has a reputation for corruption;
- there is reason to believe that the third party is likely to make improper payments or gifts while working for VASS Group;
- the Third Party requests that his or her identity be kept secret;
- the Third Party requests (without a reasonable commercial justification) that he or she be paid offshore, or up front, or in cash; or
- there are other suspicious circumstances or “red flags” that are not satisfactorily resolved.

50. The Engagement Form referenced in Section 6.1 above requires the VASS Group employee proposing the third party to certify that adequate and appropriate due diligence procedures have been performed with respect to the third party and that, to the best of their knowledge and understand, you are not aware of the existence of any information, including, but not limited to, the reasons detailed in this Policy, that would prohibit the consultant from being hired by VASS Group.

6.3. Training: Contracts

51. Third parties who are engaged must be apprised in writing of this Policy and, where appropriate, participate in further training.

52. The Chief Compliance Officer or his or her designee must confirm and document that the third party was apprised of the Policy. The VASS Group line of business responsible for the hire must provide and document any required additional training. After a third party is hired, the VASS Group line of business responsible for the hire must perform and document ongoing due diligence and training, as appropriate.

53. The third party will also be required to enter into a written agreement with VASS Group that includes anti-corruption provisions in the form attached as Attachment D to this Policy; any variations to these provisions (to take into account local laws or other considerations) must be approved by the appropriate Designated Legal/Compliance Officer

7. Merger and Acquisition Activity

54. Merger and acquisition activity is extraordinary activity that is undertaken only after approval by the company's board of directors, and is usually undertaken with the assistance of outside legal counsel. Mergers and acquisitions cannot be conducted without proper anti-corruption due diligence procedures, which should be performed by an independent external advisor.

55. Furthermore, to the extent feasible, and within the scope of their responsibilities in a merger and acquisition activity, company personnel shall work with the merger and acquisition team to plan, implement, and analyze anti-corruption due diligence information, and to take steps to assure that the company obtains in the negotiations for acquisition of a business or a part of a business representations, warranties,

indemnities, and exit rights that protect the company in the event anti-corruption liabilities are discovered at the target company or other business.

56. A copy of the due diligence checklist that are to be used in any merger and acquisition transaction are appended to this Policy as Attachment E.

8. Business Partners, Joint Ventures and Subcontractors

57. As with third parties, VASS Group may be held responsible for the conduct of those whom we hire to conduct business on our behalf or with whom we join to conduct business. Therefore, appropriate due diligence must be performed to determine that these entities understand our anti-corruption policies and have policies and procedures that are consistent with our own. External due diligence procedures should also be carried out aimed at identifying potential reputational risks of the third party and determining links with government or high-risk entities.

58. VASS Group employees are required to take steps to ensure that any business partners, joint venture partners, subcontractors or any other individuals or companies hired to conduct business on behalf of VASS Group and over which VASS Group has direct control develop and implement anti-corruption policies consistent with the general principles of this Policy. All such individuals or companies over which VASS Group does not have direct control should be required contractually (and where not legally possible be appropriately encouraged) to adhere to the general principles set out in this Policy and, where appropriate, participate in further training.

59. In this context, the anti-corruption training that the personnel subcontracted by the VASS Group must receive in order to carry out the work on behalf of the VASS Group is of special relevance. As a general rule, subcontracted personnel must receive the anti-corruption training provided for in Section 10 when their assignment involves more than [6] months as VASS Group subcontracted personnel.

60. The terms of any business partnership, joint venture or subcontracting agreement should include terms similar to those set forth in Attachment C for third parties which assist in business development, subject to variation only as approved by the Chief Compliance Officer or his or her designee.

9. Political and Charitable Contributions

61. Use of VASS Group resources to make or solicit contributions to political parties or candidates, or to charitable organizations, if done in accordance with applicable laws and regulations, is appropriate, but care must be taken to ensure that such activities do not create, or appear to create, an improper personal benefit covered by this Policy. Such contributions may be made on the company's behalf only following consultation with, and approval by, the Chief Compliance Officer.

10. Training

62. Each line of business Compliance Personnel and ultimately the Chief Compliance Officer are responsible for making available to all VASS Group (including temporary works or, where appropriate, subcontracted personnel) the appropriate training on this Anti-Bribery and Anti-Corruption Policy at least every two years, tracking training completions, and routine reporting to management.

63. Likewise, and on an annual basis, the Compliance Officer must provide the management committee and those responsible for the main risk areas with specific training in anti-corruption matters.

64. All employees should be reminded of the importance of adherence to the policy annually via awareness bulletins or comparable communications.

11. Reporting and Escalation of Issues

65. If at any time an employee of the VASS Group learns of any activity prohibited by this Policy, or if a third party offers a bribe, or a third party approaches him to request a bribe or in any way threatens the employee if a the bribe is paid, the employee must report this type of incident or any related to this Anti-Corruption Policy through the Whistleblower Channel established by VASS Group. If within 30 days of the employee or third party reporting the facts, the Chief Compliance Officer or other Compliance Personnel do not take action to respond to said report, the employee or third party must report the matter to the VASS Steering Committee. Group.

66. Likewise, and in line with the characteristics and specificities of the Whistleblower Channel established by VASS Group, the procedure for reporting

irregularities in Anti-corruption matters must allow employees or third parties to make such reports or reports anonymously, if they so wish. and always guaranteeing the confidentiality of the complaint.

12. Attachment A - VASS Group Anti-Corruption Policy

12.1 Chief Compliance Officer and Compliance Personnel

As we have indicated in section 2 of this Anti-Corruption Policy, the Chief Compliance Officer of VASS Group is Mrs. Jeannette Contreras and she may be reached through email direction: jeannette.contreras@vass.es or on mobile phone: +34 610 274 575.

Similarly, we detail below the individuals with anti-corruption compliance responsibilities for each business line of the VASS Group. Those individuals are referred to in this Policy as Compliance Personnel and are as follows:

- Mr. Francisco Javier Latasa Vassallo – Chairman / CEO of VASS Group;
 - Mr. Francisco Jose Devesa Medina – CFO of VASS Group;
 - Mr. Rafael Orueta García – Controller of VASS Group;
 - Mrs. Paula Rodrigo Lon – People & Talent Director of VASS Group;
 - Mrs. Eugenia Menéndez Rakosnik – Transformation & Strategy Director of VASS Group;
 - Mr. Jorge Gonzalez Herrero – Chief Operating Officer / COO of VASS Group;
 - Mr. Gonzalo Trigo Fernandez – Chief Technical Officer / CTO of VASS Group;
 - Mr. Eduardo Lorente Fuentes – Business Development Director of VASS Group;
- and
- Mr. Álvaro Sánchez Pozuelo – International Director of VASS Group.

