



COMPLIANCE AND CRIMINAL PREVENTION POLICY OF RAMON CLEMENTE S.A.

01.	OBJECT	2
02.	SCOPE	2
03.	PRINCIPLES AND OBJECTIVES	2
04.	APPROVAL AND EFFECTIVENESS	3

01. OBJECT

This Compliance and Criminal Prevention Policy reflects the organization's firm commitment to acting in accordance with legislation, values, and behavioural standards required by the Ethical Code and other internal regulations. The Policy outlines the principles of ethics and compliance that govern RAMON CLEMENTE S.A.

In this regard, this Human Rights Policy aims to establish the basic principles of action and commitments of RAMON CLEMENTE S.A. on this matter.

02. SCOPE

This Policy applies to all employees, directly or indirectly involved in the activities and processes of RAMON CLEMENTE S.A.

03. PRINCIPLES AND OBJECTIVES

This Policy, in line with the Ethical Code and other internal regulations, describes the ethics and compliance principles and objectives that govern RAMON CLEMENTE S.A.:

- **Promotion of ethically honest and responsible business activity** in all internal and external actions and decisions, guided by the values and commitments defined in the Ethical Code, internal regulations, as well as applicable legislation.
Therefore, all recipients of this Policy must observe, in the exercise of their functions and professional responsibilities, both the applicable legislation and the internal regulations of RAMON CLEMENTE S.A., under a zero-tolerance standard towards unlawful acts, especially those of a criminal nature.
- **Creation of a solid and effective ethical and compliance culture** based on the commitment and active participation of all individuals to whom this Policy applies, especially those holding responsible positions.
- **Safeguarding the reputation of RAMON CLEMENTE S.A.** as an organization with integrity and respect for the market and its stakeholders, based on extremely high business and ethical standards. All individuals to whom this Policy applies must ensure

the utmost care and due diligence in preserving the image and reputation of RAMON CLEMENTE S.A. in all their professional activities and public interventions.

- **Creation of a hybrid compliance organizational structure**, composed of designated individuals. This structure, which will adapt to the company's organization at any given time, will be responsible for overseeing the compliance and operation of this Policy.
- **Establishment of a risk prevention and compliance control system**, ensuring its proper management and supervision in the processes and activities of RAMON CLEMENTE S.A.
- **Promotion of awareness and training initiatives** regarding the Ethical Code.
- Promotion of a culture of open communication based on the principles of trust and transparency. RAMON CLEMENTE S.A. encourages anyone, internal or external to the organization, who detects a breach of applicable legislation, the Ethical Code, or other internal regulations, to report it through the established channels for this purpose.
- **Internal and external awareness of the consequences** arising from non-compliance with the Model.
- **Establishment of specific compliance objectives**, aligned with this Policy and the results of identifying and assessing compliance risks at RAMON CLEMENTE S.A.
- **Implementation of necessary changes** for continuous improvement of the Policy.

04. APPROVAL AND EFFECTIVENESS

This *Compliance and Criminal Prevention Policy* was approved by management on October 30, 2024. It will come into effect upon publication and is available to all collaborators.

The person holding the position of HSEQ Responsible is responsible for publishing, reviewing, and updating this Policy as needed. This Policy replaces and supersedes any other Policy or procedure.