



ANTI-CORRUPTION POLICY OF RAMON CLEMENTE S.A.

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01. CONTEXT

RAMON CLEMENTE S.A. highly values integrity and transparency, as outlined in the Ethical Code, and is committed to being a responsible company that complies with the applicable legal framework and internal principles and standards.

This Anti-Corruption Policy reflects the company's firm commitment to uphold the highest ethical standards in the market and to apply, without exception, the principle of zero tolerance towards any behaviour considered as corruption.

This Policy aims to guide behaviour, business practices, and transactions in a fair and honest manner and is an expression of the commitment made in the Ethical Code to prevent and avoid corrupt practices.

02. SCOPE

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

03. PRINCIPLES OF ACTION

Generally, corruption can be understood as any dishonest or illegal behavior that leads to an unfair advantage or benefit.

This Policy establishes the following principles to prevent corrupt practices:

- **RAMON CLEMENTE S.A. has a zero-tolerance** approach to any form of corrupt conduct, decision, or initiative.
- **RAMON CLEMENTE S.A. maintains honest, transparent, and professional relationships** and acts with integrity and professionalism at all times. Transactions and business relations with third parties should be able to be supervised and monitored transparently. To ensure this:
 - Internal processes for tracking payments, collections, and other interactions with suppliers, clients, and third parties are followed.
 - Business and representation expenses are properly recorded and approved.
- **RAMON CLEMENTE S.A. does not offer or make payments to public officials** in order to facilitate processes with public administrations.

- **Personal relationships cannot be used to illegally benefit RAMON CLEMENTE S.A.** by influencing, directly or indirectly through a third party, the decisions of public officials.
- **RAMON CLEMENTE S.A. does not make payments, in cash or in kind,** to political parties or political candidates.
- **RAMON CLEMENTE S.A. does not offer, promise, give, or accept money, discounts, or other valuables** not permitted by law or internal regulations, either to or from public officials or representatives of other companies with which RAMON CLEMENTE S.A. does business, whether directly or indirectly through third parties.
- **RAMON CLEMENTE S.A. prohibits any form of money laundering,** broadly understood as any action aimed at introducing money from illicit sources into the economy.
- **RAMON CLEMENTE S.A. rejects any conduct** that could involve the financing of terrorism.

As a general rule, gifts or courtesies may only be offered or accepted when permitted by this Policy and internal procedures. According to this Policy, the possibility of offering or accepting gifts or courtesies is subject to the following restrictions:

- With regard to the public sector, it is expressly prohibited to offer or accept gifts or courtesies to or from any public official or equivalent.
- With regard to the private sector, it is prohibited to offer or accept gifts or courtesies unless:
 - The decision has been adequately budgeted.
 - There is a specific internal rule approved by the business area or division that ensures that:
 - The gifts and courtesies are legal.
 - It is an occasional decision and a result of the company's normal business.
 - It is not made with the expectation of receiving preferential treatment or an unjustified commercial advantage, nor to exert undue influence over the recipient.
 - The gift or courtesy has a moderate value, i.e., low cost, and must be perceived as a gesture of courtesy. The internal

regulations should define the value of gifts or courtesies for them to be considered moderate.

- There is a person responsible for approving the gifts and courtesies.
 - The gift or courtesy is approved by the designated responsible person, and a register of gifts and courtesies is maintained.
- **Charitable contributions and sponsorships** must be related to legitimate business interests and made in accordance with applicable law and internal procedures. These contributions and sponsorships must have an appropriate budget and be approved by the relevant business area or division.
- **Conflicts of interest** in which personal or financial interests conflict with the interests of RAMON CLEMENTE S.A. do not necessarily constitute dishonest or illegal behavior. However, in case of conflicts of interest, the following must be considered:
 - The interest of RAMON CLEMENTE S.A. must be prioritized in any decision or behavior, and the applicable legislation and internal regulations must be adhered to:
 - The use of RAMON CLEMENTE S.A.'s resources or information for personal benefit or for inappropriate or different purposes is not allowed.
 - Internal procedures must be followed when contracting or entering into service agreements with third parties.
 - RAMON CLEMENTE S.A.'s culture requires that all conflicts of interest be reported, whether through formal or informal channels, or directly through the Communication Channel (Ethical Channel) provided for this purpose and accessible via this link: [Ethical Channel](#). The Whistleblower Channel allows anonymous reports and is managed by an independent third party. The Whistleblower Channel is especially recommended for reporting behaviors or suspicions that represent a violation of this Policy.
 - A person involved in a conflict of interest must not participate in any decision-making process related to the conflict of interest.



04. GOVERNING BODIES AND PERSONS RESPONSIBLE FOR THIS POLICY

The following bodies and individuals are responsible for this Policy:

- **The Management of RAMON CLEMENTE S.A.** has approved this Policy and ensures the allocation of the necessary resources for its compliance, review, and improvement when needed.

Management promotes the supervision of the principles set out in this Policy.

- **The HSEQ Responsible Officer** has the following independent functions:
 - Promote and disseminate the principles of this Policy internally and externally.
 - Supervise the implementation and compliance of this Policy, as well as the procedures that develop it and the associated processes and controls.
 - Coordinate training and communication initiatives for Employees (appropriate to their position) aimed at promoting a culture of managing corruption risk.
 - Coordinate and promote processes to ensure compliance with this Policy.
 - Report any circumstances or information that may affect compliance with this Policy to RAMON CLEMENTE S.A. management.
- **Employees** must:
 - Comply with and implement this Policy and any related standards.
 - Expressly commit to complying with its contents at all times.
 - Attend training or communication initiatives associated with the Policy.
 - As part of RAMON CLEMENTE S.A.'s culture, use the Whistleblower Channel or any other formal or informal channel to report any illegal or corrupt behavior, as well as any questions or situations related to corruption.

05. APPROVAL, PUBLICATION, AND REVIEW

This *Anti-Corruption Policy* was approved by management on October 30, 2024. It will come into effect from its publication and is available to all employees.

The person holding the position of HSEQ Responsible Officer is responsible for publishing, reviewing, and updating this Policy as required. This Policy replaces and supersedes any previous Policies or procedures.