

Compliance Policy

Since it was founded, SAMCA Group has built a history and reputation marked by quality and excellence, which has given it a leadership position in all the sectors in which it conducts its activity.

Over these years, the course of SAMCA Group has been guided, at every moment, by a solid commitment to respecting the current legislation, the internal regulations, as well as the ethical principles that inspire its actions.

As a consequence of the above, SAMCA Group proceeded to implement a Criminal Compliance Management System, with the objective of preventing, detecting and sanctioning the possible commission within it of irregular, unlawful or unethical conduct.

The basic elements of the Criminal Compliance Management System of SAMCA Group are included in this Policy, with which **the existing corporate culture is formalised and kept up to date regarding the absolute respect for the law, the internal regulations and the ethical standards** included in the Group's Code of Ethics, which is driven by the SAMCA's Board of Directors, and to which all the subsidiaries of SAMCA Group are adhered and which is observed by each of the persons who make up the organisation. There exists, therefore, the firm commitment of SAMCA's Board of Directors and of all the people forming SAMCA Group of complying with the requirements of this Compliance Policy and with the Criminal Compliance Management System.

Thus, this Compliance Policy has as its ultimate purpose to disseminate and communicate to all the stakeholders, including the third parties with which the Group relates, the **policy of absolute rejection and zero tolerance towards the commission of crimes** within the organisation.

The Criminal Compliance Management System of SAMCA Group is based on the following elements:

- ✓ **Code of Ethics**, in which are regulated the ethical principles and the standards of conduct that govern the actions of all the professionals and persons related to the organisation that have the condition of Subject Persons, regardless of their hierarchical level, geographic or functional location.
- ✓ **Manual of the Criminal Compliance Management System**, which is the document that implements the principal elements of the Criminal Compliance Management System, including the identification and evaluation of the criminal risks that potentially could affect the Group, the existing control environment to prevent them and mitigate them, as well as the management model of financial resources and training and dissemination procedures, among others. The Manual is arranged in Procedures that facilitate the management of the Compliance Management System.
- ✓ **Policies**, in which are synthesised certain subjects and action guidelines are specified for SAMCA's Subject Persons.
- ✓ **Protocols**, which regulate, with more detail on certain subjects, the action guidelines of certain departments.
- ✓ **The Compliance Committee**, with autonomous powers of initiative and control, is the body in charge of developing supervising and monitoring the Criminal Compliance Management System of SAMCA Group, and has been given the resources, authority and independence necessary to carry out its functions.
- ✓ **Reporting Channel**, a communication channel that will be at the disposal of SAMCA's Subject Persons, who have the obligation of communicating any suspicion or knowledge of behaviours that take place in SAMCA Group and that may constitute a violation of the current laws, the Compliance Policy and/or the Code of Ethics of

SAMCA Group. The Reporting Channel will also be available to Subject Persons Related to SAMCA.

In this regard, SAMCA Group prohibits any type of retaliation against the persons who send communications in good faith through the Reporting Channel.

- ✓ **Disciplinary regime**, the strict compliance of the law, of this Policy, of the Code of Ethics as well as the rest of the internal regulations and, especially, of the Criminal Compliance Management System is mandatory for all the persons that are subject to them. In case of non-compliance, the appropriate disciplinary measures will be adopted, according to the labour laws and other legislation that may be applicable considering the relationship between the sanctioned person and SAMCA Group.
- ✓ **Evaluation of criminal risks**, in which the potential criminal risks that could materialise in the activities carried out by the Group have been identified and assessed, taking into account all the business lines. The activities in which the risks that must be prevented can materialise include, as an example: human resources, hiring, financial management, environmental management, relations with other companies, relations with officials and Public Administrations, mining, real estate development, agriculture, agro-food, synthetic fibres, plastic polymers, renewable energy, plant nutrition and logistics. The breakdown of the specific criminal risks are specified in the corresponding maps and criminal risk sheets.
- ✓ **Training**, considered a key element to make all the members of the organisation aware and sensitive to compliance with the law, the Criminal Compliance Management System and the values and standards of conduct included in the Code of Ethics and other internal regulations.
- ✓ **Continuous improvement**, the Criminal Compliance Management System of SAMCA Group is a dynamic system, which is subject to periodic and extraordinary updates

whenever any insufficiency of it becomes apparent or in view of organisational or regulatory changes that make it necessary.

The Compliance Committee will be responsible for its implementation and monitoring, making it available to all stakeholders through the corporate website. Its updating, whenever it is necessary, will correspond to SAMCA's Board of Directors, at the proposal of the Compliance Committee, which is competent in its review.

APPROVAL

This updated version of the Code of Ethics of SAMCA Group has been approved in SAMCA's Board of Directors meeting held on 27 December 2021. It substitutes the previous version and is effective from 1 January 2022.

As a consequence of the agreements adopted by the boards of directors and decisions adopted by the sole directors of the different subsidiaries of SAMCA Group, it is applicable immediately, without the need for any additional agreement or decision, in all the subsidiaries of SAMCA Group.

Zaragoza, 27 December 2021.