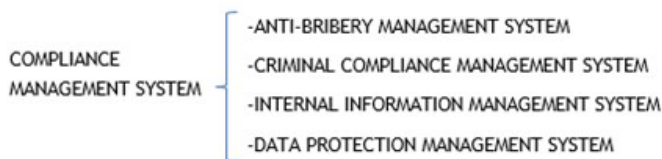


POL-05- GLOBAL COMPLIANCE POLICY

Purpose

The purpose of this policy is to establish mandatory guidelines for the implementation of an ethical, sustainable and integral culture, as well as a Compliance Management System, in order to prevent and mitigate any acts of corruption, bribery, money laundering, financing of terrorism, data protection and any act, crime and/or sanction detailed in the company's Risk Matrix, which includes different scenarios that shareholders, employees or third parties may face that represent or have any commercial and/or economic link with Propav Infraestructuras S.L. (hereinafter Propav).



Propav aspires to become a global benchmark in the infrastructure sector, going beyond mere compliance with legal regulations, guiding the entire organisation in the proper and diligent exercise of its business activities based on the following guidelines:

Fundamental Guidelines

- Ensure Propav's inalienable commitment to its Principles, Vision, Mission and Corporate Purposes.
- Promote, train and update the set of behavioural guidelines and ethical principles contained in the Code of Ethical Conduct aimed at consolidating an ethical, integrated, inclusive and sustainable business culture.
- Implement a zero-tolerance philosophy to behaviours that may involve or lead to breaches of the legislation, the Code of Ethical Conduct, and the internal management systems, and

especially those related to the criminal risks to which the company is exposed within the scope of its activities.

- Promote the ethical culture and good practices of integrity and transparency at all levels of Propav's management, including the due promotion of training in this area and the relaying of the necessary knowledge to shareholders, collaborators, partners, suppliers and other stakeholders.
- Promote an ethical culture at the leadership level by example, complying with the Code of Ethical Conduct and reacting definitively to non-compliance.
- Act in accordance with the commitments made with regard to the development of ethical conduct within the organisation and in compliance with applicable laws, guiding and orienting all staff and stakeholders in the proper and diligent exercise of their activities, rejecting any act of bribery, which will be constantly reviewed through the company's Anti-Bribery Management System.
- Implement mechanisms and methodologies to detect and assess risks in Propav's different business activities, and implement adequate measures for their management and mitigation, including continuously evaluating activities, shareholders, collaborators, partners, suppliers and/or other stakeholders.
- Implement and make available a transparent Internal Information Management System in which any stakeholder can raise an issue or report non-compliance, incorporating the principles of anonymity, confidentiality, and without fear of reprisal.
- Guarantee conformity with the processes and requirements applicable to the Compliance Management System in order to achieve the

POL-05- GLOBAL COMPLIANCE POLICY

- planned objectives.
- Systematically promote the continuous improvement of the management processes that form the Compliance Management System, providing training and assistance to all sectors of the company.
- Guarantee the independent responsibilities of the Ethics and Integrity Committee, which is the body responsible for implementing and supervising the company's Compliance Management System, being bestowed autonomy in decision-making and the authority to conduct its functions adequately.
- Conduct potential investigations of non-compliance in a fair and accurate manner.
- Manage the consequences of Code of Ethical Conduct or regulation violations, applying corrective disciplinary measures and specific training, taking into account the criteria and objectives set out in the Code of Ethical Conduct and other internal company documents.

At Propav, an effective ethical culture goes beyond establishing programmes, policies and regulations, ultimately requiring it to be ingrained in each employee, allowing them to guide themselves in their daily decision-making for the benefit of a more sustainable, ethical and integral management of the organisation.

2023/03

