

 <small>FOR FUTURE GENERATIONS</small>	INSTRUCTION OF THE INTEGRATED MANAGEMENT SYSTEM	<b>Code:</b> <b>IRE-S07.05</b>	
	<b>Anti-Corruption Policy</b>	<b>Edition: 0</b>	<b>Date: 01/12/19</b>

## Anti-Corruption Policy

### Content


<u>1.</u> <u>Object</u> .....	3
<u>2.</u> <u>Reach</u> .....	3
<u>3.</u> <u>Principles and responsibilities</u> .....	3
<u>4.</u> <u>Review and update</u> .....	6

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### ***1. Object***

Establish the commitment and guidelines of action of Exkal and all its employees with regard to the fight against corruption.

### ***2. Reach***


This Policy and Procedure apply to the company Exkal S.A (hereinafter, the company or the Company).

In those companies involved in which this policy is not in place, Exkal will promote principles and guidelines consistent with those established in this policy, ensuring the maintenance of adequate information channels to ensure their knowledge and application.

### ***3. Principles and responsibilities***

In order to prevent corruption, Exkal will carry out all its activities in accordance with the legislation in force in all areas of action and in all the countries in which it operates, taking into account its spirit and purpose, and undertakes to:

- Do not influence the will or objectivity of persons outside the Company to obtain any benefit or advantage through the use of unethical practices and/or contrary to applicable law.
- Not make or offer, directly or indirectly, any payment - in cash or otherwise and in any contractual form - or any other benefit or advantage to any natural or legal person: (i) at the service of any authority, entity, public or private, political party or candidates for public office, with the intention of obtaining or maintaining, unlawfully, business or other advantages; (ii) with the intention that they abuse their influence, real or apparent, in order to obtain from any authority, entity, public or private, any business or other advantage; or (iii) where it is known that all or part of the money or species will be offered or delivered, directly or indirectly, to any authority, entity, public or private, political party or candidates for public office, for any of the purposes mentioned.
- Do not finance or show support of any other kind, directly or indirectly, to any political party, its representatives or candidates.
- Do not use donations to cover up improper payments.
- Do not improperly, directly or indirectly request or receive commissions, payments or profits from third parties on the occasion of or with cause in the Company's investment, disinvestment, financing or expenses operations.

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- Promote and incentivize among its partners, suppliers, contractors and collaborating companies the knowledge of this policy and the adoption of behavioral guidelines consistent with it.
- Pay special attention to cases where there are indications of lack of integrity of the persons or entities with which business is carried out, in order to prevent and prevent the laundering of capital from criminal or illicit activities.
- Faithfully and adequately reflect all of the Company's actions, operations, and transactions in the Company's records and systems.
- Act under the principle of transparency of information, reporting all the actions, operations and transactions of the Company, in a truthful, clear and contrasting way.

Previous commitments and guidelines of conduct are contained in the Company's Code of Ethics. The company has internal control and regulatory compliance mechanisms to try to respond and control against possible breaches.

The Company has in turn various communication mechanisms that allow employees and any third party to send, confidentially, any inquiries about these and other issues related to the matter and their possible violations or breaches.

#### ***4. Review and update***

The Internal Control area will periodically report to the Property, all modifications or incidents recorded in its scope of responsibility.

To verify the validity of this policy, senior management will periodically review the principles and procedures set out therein.

Exkal believes that it is only from the involvement of all persons involved in its activities that it is possible to comply with and enforce this policy.