

# CRIMINAL RISK MANAGEMENT SYSTEM

## CRIMINAL RISK PREVENTION POLICY

The logo for Salazar, featuring a stylized white 'S' followed by the word 'alazar' in a bold, sans-serif font, all set against a dark blue background.

## 1 Purpose.

The purpose of this policy is to strengthen the principles governing the commitment of COMERCIAL SALGAR, S.L. (hereinafter, "SALGAR" or the "Company") to the prevention, detection and response to any conduct that involves an act contrary to the legal obligations and commitments voluntarily assumed by the company.



Therefore, it is aligned with the provisions of the SALGAR Code of Conduct, ratifying the will to promote, encourage and guarantee the integrity and ethics of COMERCIAL SALGAR S.L., as well as to prevent and reprove, where appropriate, any anomalous conduct that does not conform to the values, principles and standards set out in the Code itself.

## 2 Scope of application.

The provisions of the Criminal Risk Prevention Policy apply to all members of COMERCIAL SALGAR, SL (hereinafter, "SALGAR" or the "Company").

For these purposes, "members" are considered to be the people who form the Governing Body, managers, technical, administrative and operational personnel, sales representatives, advisors, lawyers, consultants, and anyone who provides their services in the name of, on behalf of and for SALGAR, regardless of the type or duration of their contractual relationship.

SALGAR will promote the application of the provisions of this policy, to the extent appropriate, to its customers, suppliers, service providers and other third parties with whom it has dealings in the course of its operational activity.

## 3 Commitment of the Governing Body.

SALGAR's Governing Body is responsible for, among other things, formulating the strategy and approving the Criminal Risk Prevention Policy of the Company, as well as organising the internal control systems in order to maintain strict compliance with the Policy within the Company.

That is why, in the exercise of this responsibility, and in accordance with the corporate culture of risk prevention, through this Policy, the Governing Body demonstrates the firm commitment of SALGAR and all its members to the following points:



- To know and strictly comply with the legislation in force in the area of development of its activities, as well as to fully respect the obligations and commitments assumed in its contractual relations with third parties.
- To implement all the means and resources necessary to promote, as appropriate, the prevention, control, detection and punishment of any unlawful or unethical acts and conduct that may be committed within the Company.
- To respect the general principles for the prevention of offences set out in the Criminal Risk management System Manual and to ensure compliance with the Code of Conduct.
- To maintain honest and decent behaviour in all its actions, avoiding all forms of corruption and respecting at all times the particular circumstances and needs of all those involved in the Company's business and professional activities.

This commitment to **zero tolerance and opposition to the act of committing any kind of unlawful act** (civil or criminal), and to maintaining at all times a **business culture of honesty, integrity and ethics** is promoted by the Governing Body and the Directors and must be observed by each and every person at the Company.

Consequently, strict compliance with legislation, the Code of Conduct, as well as the remaining internal regulations of the integrated management system and the Criminal Risk Management System (hereinafter CRMS or Compliance), is mandatory for all members of the Company; in such a way that the appropriate disciplinary measures will be adopted, on a case by case basis, to any sanction that may breach these standards.

As proof of this firm commitment, SALGAR has elaborated a CRMS, appointing a **Compliance Body**, with autonomous powers of initiative and control, responsible for the development, supervision and monitoring of the system. This Body has been provided with the resources, independence and authority necessary for the development of its functions.

Similarly, SALGAR has a **Whistleblower Channel**, as a completely confidential communication channel that is available to all the members of the Company and relevant third parties, who are obliged to report any suspicion or knowledge of unlawful activities or acts contrary to the culture of compliance within SALGAR.

#### 4 Non-compliance with the Policy.

Any breach of the measures set out in the Criminal Risk Management System implies non-compliance with this Policy. The disciplinary measures established in the Collective Agreement will be applied, and where not provided for therein, the sanctioning system established in the consolidated text of the Workers' Statute Law (Royal Legislative Decree 2/2015, of 23 October) will be applied. In addition, where appropriate, the



corresponding civil, administrative or criminal legal actions will be brought against the employee who has committed such irregular conduct or breached the external and internal legal regulations approved by SALGAR.

Ignoring this Policy, its content, SALGAR's standards and the law is no excuse as this Policy is mandatory for all of us at SALGAR from the moment it is published.

Compliance levels will be regularly monitored and the results will be reviewed by the appropriate corporate bodies



## 5 Approval, validity and revision.

This Criminal Risk Prevention Policy has been approved by the Governing Body of SALGAR, on 18 October 2022, and has an indefinite duration.

The Compliance Body is responsible for the implementation, monitoring and revision of this Policy, making it available to all stakeholders through the company website and it will propose any amendments and updates that help to continuously improve and develop the Policy to the Governing Body, taking into account, as appropriate, the suggestions and proposals made by the members of SALGAR or any other relevant parties.

## 6 Track Changes.

Revision No.	Description	Date
00	Production of documentation	15/09/2022
00	Approval	18/10/2022

Signed

Milagros Salinas Villalba

Juan José Cortés Royo

**Joint and Several Directors of COMERCIAL  
SALGAR S.L.**



