

CRIMINAL AND ANTI-BRIBERY COMPLIANCE POLICY

ESCRIBANO MECHANICAL & ENGINEERING, S.L.U. is a national family company at the forefront of technology and innovation that designs and manufactures complex defence systems at its facilities in Alcalá de Henares.

The Management of ESCRIBANO MECHANICAL & ENGINEERING, S.L.U., committed to the highest ethical standards in the development of its business activities, has decided to establish, implement, maintain and continuously improve a Criminal Compliance and Anti-bribery Management System in compliance with the UNE-ISO 19601:2017 "*Criminal Compliance Management Systems*" and ISO 37001:2017 "*Anti-bribery Management System*" standards.

The purpose of this Policy is to reaffirm the commitment of ESCRIBANO MECHANICAL & ENGINEERING, S.L.U. to comply with the criminal and anti-bribery legislation and regulations in force, as well as with the ethical principles contemplated in the internal regulations. This Policy complements the provisions of the Code of Ethics and Conduct applicable to the organisation, ratifying its willingness to combat, prevent and prohibit the perpetration of any illegal act or bribery within the organisation.

The general principles that drive the Criminal and Anti-Bribery Compliance policy are:

- Establish a policy and guideline structure for the approval and development of plans to mitigate and minimise the company's risks.
- Implementation of the necessary actions to prohibit and prevent the commission of illegal acts, bribery and/or corruption.
- Establishment and periodic review of criminal and anti-bribery compliance objectives appropriate to the purpose and context of the organisation.
- Commitment to the treatment of risks that may affect the organisation, through the identification, management and control of the different activities of the organisation.
- Management commitment to implement a continuous improvement on Criminal Compliance and Anti-Bribery Management System.
- Establishing the obligation to report or denounce, by the means provided, any fact or conduct that could be considered contrary to the Code of Ethics, the legislation in force and the company's internal policies and rules.
- Provide adequate communication channels, guaranteeing both confidentiality and the absence of retaliation against complainants, to encourage the reporting of concerns in good faith or on the basis of a reasonable belief by any employee or interested third party.
- Establish a disciplinary regime, according to the legislation applicable at any given time, for conduct aimed at preventing or hindering the discovery of crimes and the failure to report a criminal act.
- Providing the material and human resources, authority and independence to the Committee of Compliance so that they can conduct the task entrusted to them.

The Management declares that the enforcement of this policy and the requirements of the Criminal Compliance and Anti-bribery management system are mandatory for all members of the organisation, regardless of the position they hold, and for any third party that has a relationship with the entity.

ESCRIBANO MECHANICAL & ENGINEERING, S.L.U. is committed to communicate and make available to all interested parties this policy, along with the achievement of the objectives established from it.

Alcalá de Henares, September 19th, 2022.

Javier Escribano Ruiz
President