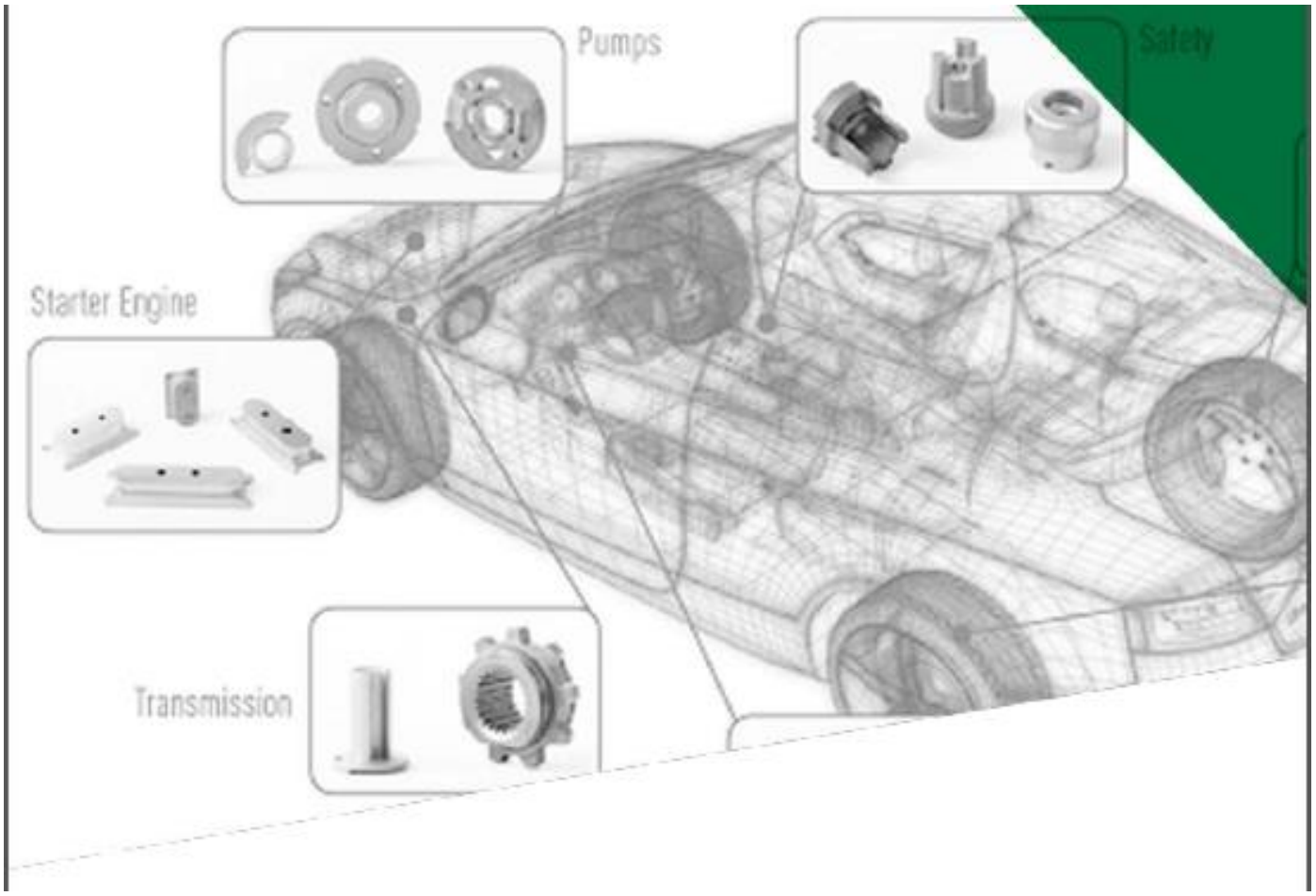


Legal Compliance Program at Criminal matters

CZ SINTER TECH SL.

Bilbao, September 2026

Private and confidential

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1. Objectives and scope of the This legal compliance program.

1.1. Prior

- The purpose of this Legal Compliance Programme in criminal matters, hereinafter referred to as the "Compliance Programme", is to define the Compliance System of CZ SINTERTECH SL.-TRAPAGA SINTERING, S.L. Unipersonal (hereinafter, CZ SINTERTECH SL.), the purpose of which is to adopt the possible and necessary organisational and management measures aimed at preventing, within what is reasonably foreseeable, the emergence of conduct potentially classifying as criminal - in accordance with Spanish legislation - that could occur during the development of the organisation's activity.

- In this sense, its content will be mandatory for any person, natural or legal, who performs administration, management or work performance tasks on behalf of and within the organizational chart of CZ SINTERTECH SL.

1.2. Explanatory memorandum

- Following the entry into force of the reforms of the Penal Code, operated by Organic Law 5/2010, of 22 June, and Organic Law 1/2015, of 30 March, in relation to the obligation of every company to establish within it a model of organisation, management and control for the prevention of crime, that is, a surveillance and control programme for the prevention of crimes, the entity has undertaken a process of review and updating of its control systems to ensure that they are adapted to these new legal requirements, in particular in accordance with the provisions of the new article 31 bis of the Criminal Code, taking extreme preventive measures to avoid the commission of possible criminal offences in their environment.

- As expressly stated in the aforementioned regulations, it is an exemption from criminal liability for legal persons to have efficient and effective "Organisation, Management and Control Models" that allow them to prevent the commission of the crimes typified in our Criminal Code. Therefore, the appropriate instrument that allows the exclusion of the "culpability" of the company and, consequently, also the imposition of sanctions on it is an appropriate organization. In particular, liability is excluded when the undertaking is able to demonstrate that:

  - (1) that the administrative body has adopted and effectively implemented, before the offence is committed, an organisational and management model that includes the appropriate surveillance and control measures to prevent offences of the same nature or to significantly reduce the risk of their commission;

- 2. that the supervision of the operation and compliance with the prevention model implemented has been entrusted to a body of the company with autonomous powers of initiative and control or that is legally entrusted with the function of supervising the effectiveness of the internal controls of the legal entity;
- 3. that the individual perpetrators have committed the crime by fraudulently circumventing the model of organization and prevention, and
- 4. That there has been no omission or insufficient exercise of the functions of supervision, supervision and control by the body of the company with autonomous powers of initiative and control or that is legally entrusted with the function of supervising the effectiveness of the internal controls of the legal person.

- Likewise, this model of organization and management must meet the following requirements:
  - 1. To identify the activities in which the crimes that must be prevented may be committed.
  - 2º To establish the protocols or procedures that specify the process of forming the will of the legal person, of adopting decisions and of executing them in relation to them.
  - 3. To have appropriate financial resource management models to prevent the commission of the crimes that must be prevented.
  - 4. To impose the obligation to report possible risks and non-compliance to the body in charge of monitoring the operation and observance of the prevention model.
  - 5. Establish a disciplinary system that adequately punishes non-compliance with the measures established in the model.
  - 6. Carry out a periodic verification of the model and its possible modification when relevant infringements of its provisions are revealed, or when there are changes in the organisation, in the control structure or in the activity carried out that make them necessary.

- In this regard, and under the impetus of the Administrative Body, a complete and updated model of organization, management and control for the prevention of crimes has been formalized, complying with each and every one of the requirements of the current Criminal Code. To this end, the possible criminal risks faced by the organisation have been examined, as well as the existing internal controls aimed at minimising them, adopting the necessary measures to strengthen and update these controls in relation to the criminal risks detected.

- In conclusion, this organization follows a strict and serious policy of action against the prevention and commission of criminal offenses within it, as reflected in the ethical principles indicated in this Compliance Program, which are mandatory for all employees, and which, without a doubt, They promote good business practice, both from a legal and business point of view, in total consonance and respect with our legal system.

1.3. Functions

- This Compliance Program, in accordance with the new wording of article 31 bis of the Criminal Code, has a dual function:
  - i) To implement a culture of compliance in the sense of trying to avoid or reduce the risk that crimes are committed in the name or on behalf of the organization, and for its direct or indirect benefit, by its legal representatives or by those acting individually or as members of an organ of the legal entity, are authorized to make decisions on behalf of the entity or hold organizational and control powers within the entity; as well as to avoid or reduce the risk that crimes may be committed, in the exercise of social activities and on behalf of and for the direct or indirect benefit of the organization, by those who, being subject to the authority of the natural persons mentioned above, may carry out the acts because they have seriously failed to comply with the duties of supervision, surveillance and control of their activity, taking into account the specific circumstances of the case
  - ii) To implement mechanisms so that, in the event that, despite this preventive function, the aforementioned persons *UT supra* commit crimes within the entity, they can be brought to the immediate attention of the competent authorities, thus complying with the duty of reporting that is set out in our current legislation.

1.4. Compliance objectives Criminal

- The Compliance Program, as outlined in this document, aims to illustrate the system of rules of action and behavior that regulate the activity of the organization that make up the Compliance System, as well as to create the necessary organizational and management mechanisms for the purpose of preventing the commission of the crimes typified in the current Criminal Code. through its prevention, early detection and management.
- In particular, the Compliance System delimited by the Compliance Program has the following objectives:
  - Improve the organization's management system, incorporating and deepening the culture of criminal compliance;
  - Reflect a structured and organic system of prevention and control aimed at reducing the risk of committing crimes related to the organization's activity;
  - To raise awareness among all persons acting in the name and on behalf of the organization, contributing to the activities and processes considered susceptible to crime, that if they violate the provisions contained in this Compliance Program, they may incur in a criminally or administratively sanctioned infraction not only against themselves but also against the organization;
  - Communicate to all persons acting in any capacity in the name, on behalf of, or in any way in the interest of the organization, that a violation of the provisions contained in this Compliance Program entails the application of sanctions or the termination of the contract;

- It should be noted that the organisation strongly condemns any type of illegal behaviour, since it would in any case be contrary to both the legal provisions and the ethical and social principles that the administrative body intends to respect in order to achieve its business mission (even if this circumstance could apparently be advantageous for the organisation);
- Carry out continuous control action on the processes and activities susceptible to crime, as well as on the processes and activities ancillary and/or supporting the commission of crimes in order to allow the organization a rapid intervention aimed at preventing or counteracting the commission of the crimes themselves.

1.5. Recipients

- The Compliance Program is aimed at all the organization's personnel, natural and legal persons who exercise representation, administration or management functions in the entity or who are specifically responsible for managing and controlling the entity, as well as all personnel hired on a permanent or occasional basis, and all those who act in the name or on behalf of the organization. All of them are linked to the provisions contained in the Compliance Program – or its development – and that delimit the Compliance System and integrate the Compliance policy.
- In particular, this Compliance Program especially involves all persons who, within the scope of the organization's processes, are responsible for carrying out the activities classified as "susceptible to criminal risk".
- To ensure compliance with the provisions of this Compliance Program with interested parties with whom there is a significant relationship from the point of view of the organization's activity, the new contracts signed after the approval of this Compliance Program may also include clauses that oblige suppliers and advisors to respect the Compliance policy. in particular embodied in the principles contained in the Code of Ethics of the organization, as well as to respect current legislation, especially in criminal matters.

2. Effectiveness of the compliance program legal in criminal matters. The culture of compliance: inspiring principles of this programme.

- CZ SINTERTECH SL. declares from the moment of the approval of the Compliance Program its absolute willingness to comply with and ensure compliance with both the obligations legally imposed on it and this Compliance Program, which constitutes the axiomatic essence of the Compliance System.

- This culture of compliance reaches the activity or activities of the organization in such a way that the Compliance Program will be executed on each and every one of the decision or execution processes that make it up.

- Specifically, the activities of the organization are metallurgy in general, and especially metal surface treatment powder; production of metal articles and production and trade of vehicle components.

- The Compliance Programme covers all the organisation's staff located at its registered office in Trapagarán (Bizkaia).

2.1. To employees, managers and members of the entity.

- Compliance with this Compliance Program is an integral part of the obligations of all members of the organization, who are the recipients of it.

- The recipients of the Compliance Program are obliged to observe the provisions contained therein, both in relations with each other (i.e., in internal relations) and in relations with third parties (i.e., in external relations). Specifically:
  - i. The members of the administrative bodies, within the scope of their administrative and control functions, shall be inspired by the principles of this Compliance Programme;
  - ii. The organization's managers will adjust their conduct to the principles set forth in this Compliance Program and will require that employees and collaborators also observe them. To this end, the conduct of those responsible constitutes an exemplary model. For the purposes of this Compliance Programme, each of the controllers will be directly responsible for the coordination and/or control of the collaborators subject to their direction and supervision in relation to the prevention of breaches of this Compliance Programme;
  - iii. Employees shall conform their conduct to the principles set forth in this Compliance Program and to the communications of its managers in relation to it.

2.2. To the parties interested parties

- When a member of the organization, in the exercise of his functions, comes into contact with third parties, he must:
  - i. Inform, to the extent necessary, the interested party of the Compliance policy, and in particular, of the obligations established in the Compliance Program;
  - ii. To require, if necessary, thecompliance with the obligations formulated in this Compliance Program that are directly related to the activity of the interested party;
  - iii. In the case of the employee, refer to his or her manager and, in the case of the person in charge or the member of the entity's management bodies, refer to the competent entity in each case, any conduct of interested parties contrary to this Compliance Program or, in the case of the person in charge or the member of the entity's management bodies, any case, which induces the employee to commit violations of this program.
- The organization will promote the application of the culture of compliance that is integrated by the fundamental principles contained in this Compliance Program and, taking into account the legal, social, economic and cultural system of reference, the application of the rules of this program to the interested parties.

2.3. Fundamental principles.

2.3.1. Legality

Compliance with the law, as well as with the rules of its bylaws, is a fundamental principle for this organization. Within the scope of their functions, the recipients (employees, managers and members of the entity's administrative bodies) must abide by the rules of the legal system (national, supranational or foreign) in which they operate and must, in any case, refrain from committing violations of the laws, whether these are subject to prison sentences, pecuniary or to administrative or other sanctions, as if they were not.

Each of the addressees shall observe, in addition to the general principles of diligence and fidelity, the requirements, as regards their conduct, stipulated in the collective agreements applicable to them.

2.3.2. Integrity

The quality and efficiency of the organization, as well as its reputation, constitute an inestimable asset and are largely determined by the conduct of each of the members of the organization. Any recipient of the Compliance Programme, therefore, must maintain a behaviour that contributes to safeguarding said heritage and, in particular, the reputation of the organisation, both in the workplace and outside them.

Specifically, in the performance of their duties, each of the aforementioned will maintain a conduct inspired by integrity, taking into account the various social, economic, political and cultural contexts of reference and, in particular, the values of honesty, correctness and good faith.

2.3.3. Dignity and Equality

Each of the members of the organization shall recognize and respect the dignity of persons, the private sphere and the human rights of every individual.

Likewise, each one will be open to working with women and men of different nationalities, cultures, religions and races. Discrimination, harassment or sexual, personal or any other offenses will not be tolerated.

2.3.4. Professionalism

Each of the employees, managers and members of the entity's administrative bodies will carry out their activity with the professionalism required by the nature of the tasks and functions that they have to exercise, making the maximum effort to achieve the objectives assigned to them and diligently carrying out the necessary activities of specialisation and updating.

2.3.5. Information/training and transparency

The members of the organization will be willing to receive the periodic information and training that is appropriate in accordance with the provisions of this program, which constitute a fundamental axis of the culture of compliance and, at the same time, will carry out their functions respecting and complying with the communication processes that are foreseen and that are inspired by clarity, completeness, precision and sharing.

3. Analysis of the organization.

- This Compliance Programme has been prepared on the basis of the information that the organisation itself has provided to its authors in relation to the activities carried out by the organisation. This information has been provided documentarily and verbally – interviews and meetings.

  - The **following information is contained** in ANNEX I:

1. Documentation of CZ SINTERTECH SL. and its activity.
2. Audit of annual accounts for the years 2017, 2018 and 2019.
3. Determination of the Power of decision.
   Outline and description of the jobs.
4. Documentation Products y services; contractual –clients/users- and derivative.
5. Documentation relative a internal-labor contracting and subcontracting.
6. Documentation relative a Contests Public.
7. Documentation relating to suppliers.
8. Documentation relative a public subsidies.
9. Social Security documentation.
10. Tax documentation.
11. Environmental documentation.
12. Documentation regarding licenses, patents and trademarks.
13. ISO and Quality Standards - Company Procedures.
14. Consumer documentation.
15. CNMV documentation, Bank of Spain.
16. Data Protection Agency Documentation.
17. Documentation of infractions and sanctions for workers.
18. Documentation Incidents judicial and extrajudicial.
19. Personal interviews with members of the organization.

4. Analysis of the activity carried out in the organization and identification and evaluation of their "criminal risks": Map of criminal risks.

4.1. Compliance with the law

- This Compliance Program, in accordance with current regulations, contains the necessary analysis to identify the activities in which crimes may be committed within the organization and which we call "Criminal Risk".
- The identification of the organisational processes susceptible to the offences mentioned in our Penal Code – Organic Law 10/1995, of 23 November – is, therefore, the starting point for any compliance system whose rules are integrated into this Compliance Programme. Consequently, the organization will maintain an updated analysis of the entity's activities and its organizational structure, based both on the entity's internal documents and on interviews with members of its organization, in order to identify the possible "criminal risks" present in the different sectors of activity.
- In this way, the analysis contained in this Compliance Programme will be adapted to the areas of action and the specific organisational structures of the entity, referring to the specific risks of committing a crime derived from the performance of the activities of CZ SINTERTECH SL.

4.2. Identification of processes and activities susceptible to crime

- The identification of processes and activities susceptible to relevant crimes - Criminal Risks - as provided for in our current regulations will be carried out in accordance with the information provided by the people related to each area or unit that make up the organization.
- In this sense, by virtue of the type of activity carried out by the organization, in order to define the risk areas, the positions of the organization have been examined in relation to the eventuality that people related to the areas/units of the organization incur in crimes during the performance of their activities, detecting risk situations that could lead to the commission of criminal acts.
- In any case, the Compliance System described in this Compliance Program is aimed at preventing, within reason, the commission of crimes within the organization, taking into special consideration specific types of crime, in accordance with the existing regulations in the current Criminal Code, and the specific risks existing in the organization given its scope of action. both extremes that make up the "Criminal Risks".

4.3. Criminal risk map

This Compliance Programme contains the appropriate CRIMINAL RISK MAP, prepared after carrying out the assessment of "criminal risks" in relation to the specific types of offences that are committed against the criminal liability of legal persons by Organic Law 5/2010, of 22 June, and Organic Law 1/2015, of 30 March, marks as possible criminal offences attributable to a legal person.

Therefore, the CRIMINAL RISK MAP prepared *ad hoc* for CZ SINTERTECH SL., is based on what could be called the typical scope of criminal liability of legal persons, which is limited to the commission of certain criminal figures of the special part (*numerus clausus).*

By virtue of this, the organization's CRIMINAL RISK MAP is limited to the following types of crime analyzed, which is incorporated into this Compliance Program through ANNEX II:

- Crime of Illegal Trafficking of Human Organs (Art. 156 BIS).
- Offence of trafficking in human beings (Art. 177 BIS).
- Crime of pornographic material and corruption of minors (Art. 189 BIS).
- Offence of discovery and disclosure of secrets (Articles 197, 197 BIS, 197 TER and 197 QUINQUIES CP).
- Crimes of fraud (Articles 248 to 251 BIS CP).
- Frustration of execution (Arts. 257 to 258 TER CP).
- Punishable insolvencies (Articles 259 to 261 BIS CP).
- Offence of computer damage (Articles 264 to 264) QUARTER CP).
- Crimes relating to intellectual and industrial property, the market and consumers (arts. 270 to 286 CP).
- Crime of corruption in business (Arts. 286 BIS a 286 QUARTER CP).
- Crime of money laundering (Articles 301 and 302 of the CP).
- Offence of illegal financing of political parties (Art. 304 BIS CP).
- Crimes against the public treasury (Art. 305 + 310 BIS CP).
- Fraud against the General Budgets of the Union European (Art. 306 + 310 BIS CP).
- Offences against Social Security (Articles 307 to 307 TER + 310 BIS CP).
- Subsidy fraud (Art. 308 + 310 BIS CP).
- Accounting crime (Art. 310 + 310 BIS CP).
- Crime of illegal trafficking or clandestine immigration of persons (Art. 318 BIS CP).
- Crimes against territorial planning and urban planning (Art. 319 CP).
- Crimes against natural resources and the environment (Articles 325 and 328 of the Criminal Code).
- Risk crimes caused by explosives and other agents (Art. 348 CP).
- Illegal landfill offences (Art. 343 CP).
- Crimes against public health (Articles 359 to 369 BIS CP).
- Offence of counterfeiting means of payment (Art. 399) BIS CP).
- Bribery offences (Articles 419 to 427 BIS CP).
- Crimes of influence peddling (Articles 428 to 430 CP).
- Crime of embezzlement (Articles 432 to 435 BIS CP).
- Incitement to hatred and violence (Art. 510 BIS).
- Crime of terrorism (Article 576 CP).
- Offence of smuggling (Art. 2 LO 12/1995).
- Transfer of criminal liability in cases of transformation, merger, absorption or division of a legal person (art. 130.2 CP).

5. Mandatory preventive measures compliance for the recipients of this legal compliance program: The "preventive measures of concrete compliance" and the "code of ethics".

5.1. Measures mandatory preventive measures

The organisation, within the framework of its zero-tolerance policy towards the commission of criminal offences within it, based on the evaluation of the "Criminal Risk Areas", which have been incorporated into this Compliance Programme as Annex II -CRIMINAL RISK MAP-, has developed various preventive measures that must be complied with by the recipients of this Compliance Programme. divided on the one hand into a document that contains the "PREVENTIVE MEASURES OF CONCRETE COMPLIANCE" that must be carried out in the organization, in order to minimize the criminal risks that have been glimpsed in it. There are also other preventive measures, which are specified in a "CODE OF ETHICS".

These preventive measures, together with the creation of the control body – Statutes of the Control Body – and the internal complaint and consultative channel – mechanisms that are developed in this Compliance Programme, make up the substrate and essence of the Compliance System contained in this Compliance Programme. In this regard, the purpose of the Compliance Programme, as has already been explained, is to adopt the possible and necessary organisational and management measures aimed at preventing, within what is reasonably foreseeable, the emergence of conduct potentially classifying as criminal that could occur during the development of the organisation's activity.

Consequently, the organisation, with the aforementioned preventive measures, is undoubtedly committed to the complete establishment, within it, of the organisation, management and control model for the prevention of crime, in line with its principles and values of total reproach to any criminal behaviour, with its consequent respect for legality and regulatory compliance to the fullest extent.

5.2. The "Preventive measures of concrete compliance"

In accordance with the regulation of Article 31 bis of the
Penal Code, which brings with it the Organic Law 1/2015, of 30 March, it seems necessary for every organisation to comply with a series of preventive measures so that it can be exempted from criminal liability.

In compliance with this precept, and in its firm intention to comply with the law and fight against crime, this organization has established a series of "PREVENTIVE MEASURES OF CONCRETE COMPLIANCE", which are incorporated into this Compliance Program through ANNEX III, and which are specified in the following sections:

1) Organization of the entity and decision-making: measures aimed at a correct and adequate process of forming the will of the legal person, of adopting decisions and of executing them in relation to them.

2) Economic and financial management: establishment of an appropriate financial resource management model to prevent the commission of the crimes that must be prevented.

3) Specific preventive measures, given the assessment carried out of the "Criminal Risks" that have been incorporated into this Compliance Programme as Annex II - CRIMINAL RISK MAP.

These measures, specified therein, must be complied with by all the recipients of them within the organization, thus guaranteeing that the organization and management model adopted by the entity complies with the purposes of its creation and establishment, which is none other than the prevention of crimes within the organization.

5.3. The code of ethics.

The CODE of ETHICS of the organization expresses the ethical commitments and responsibilities when carrying out the corporate activity in all its lines of action and work, either directly or indirectly, as well as of its components, whether they are members of the administrative bodies or employees, in any sense, of such legal persons.

The organization is convinced that ethics when conducting business affairs is an essential condition for its success, it is also a tool for promoting its image and represents a fundamental asset of the entity.

That is why, as an essential preventive measure, in order to prevent the commission of criminal offences within the entity, the organisation has a CODE of ETHICS, which must be complied with by all members of the organisation, and which is incorporated into this Compliance Programme by means of **ANNEX IV,** constituting an integral part of the organisational system. management and control of the entity, in accordance with the reforms of the Criminal Code, operated by Organic Law 5/2010, of 22 June, and Organic Law 1/2015, of 30 March, in relation to the obligation of every company to establish within it a model of organisation, management and control for the prevention of crimes, that is, a surveillance and control program for the prevention of crimes.

To this end, the CODE of ETHICS, in line with the principles of correctness, loyalty and honesty already shared by the entity, is aimed at regulating, through rules of behavior, the activity of the organization itself, establishing the general criteria to which any companies of the organization must also abide.

Likewise, in no case is it admitted that any member of the organization pursues or carries out objectives or interests of the organization or of third parties linked to it in violation of the provisions of the CODE of ETHICS.

The ETHICAL CODE must be considered binding on all members of the organization. The organisation will also request that the main organisations that have a relationship with the entity (understood as any related companies, investees, main suppliers, customers, etc.) behave in accordance with the general principles of the Code, without prejudice to respect for their respective religious, cultural and social specificities.

For the effectiveness and binding nature of the CODE of ETHICS, it will be disseminated internally within the organization; facilitating access to it at all times to each and every one of the members of the organization from the personnel reception phase, disseminating it among all the people who maintain relations with the organization.

6. Creation and determination of the Statute of the control body. Your communication channels.

Following the entry into force of the reforms to the Criminal Code, implemented by Organic Law 5/2010, of 22 June, and Organic Law 1/2015, of 30 March, in relation to the obligation of any entity to establish within it a model of organisation, management and control for the prevention of crimes, that is, a surveillance and control programme for the prevention of crimes, the organisation is undertaking a process of review and updating of its control systems to ensure that they are adapted to these new legal requirements, in particular in accordance with the provisions of the new article 31 bis of the Criminal Code, taking extreme preventive measures to avoid the commission of possible criminal offences in its environment.

In this sense, the exemption from criminal liability, as provided for in article 31 bis of the Criminal Code, also requires the mandatory institution of an internal control body of the entity, which has total autonomy in terms of both control power (to constantly ensure the operation and compliance of this Compliance Programme) and power of initiative (to ensure that it is updated).

In order to adequately carry out the development and limits of this institution, called the Control Body, the organization has drawn up the following internal regulations:

- **Statutes of the Control Body**, which are incorporated into this Compliance Program as **ANNEX V**.
- **Sanctioning Procedure**, which are incorporated into this Compliance Program as **ANNEX VI.**
- **Consultative Procedure**, which are incorporated into this Compliance Program as **ANNEX VII.**

This internal regulation shall contain and delimit the powers of the control body and its compliance officer, as well as their communication channels; which are specified in a consultative procedure and a sanctioning procedure.

In any case, the members of the organisation must abide by the decisions of the control body in their own powers and are obliged to facilitate as much collaboration as they need for the fulfilment of their purposes within their statutes.

7. Information and training policy.

- Adequate training, as well as the constant information of the recipients of the Compliance Program regarding the principles and prescriptions established therein, represent very important factors for the correct and effective implementation of the organization's criminal prevention system and the achievement of the maintenance of an adequate compliance culture.

- All internal staff, as well as external collaborators, have the duty to be fully aware of the objectives of correctness and transparency that are intended to be pursued with the Compliance System delimited in the Compliance Program, as well as with the actions derived from it.

7.1. Training and information of staff

- The organization will design a specific communication and training plan aimed at informing and training all its members in the culture of compliance. This plan will be managed by the bodies of the organisation competent for this purpose.

- In particular, with regard to communication, the entity will ensure the publication of a communication signed by the Board of Directors on the existence, obligation and content of the Compliance Programme – the parts of which it consists – the importance of its effective implementation, as well as the information and training policy established by the organisation.

- Likewise, new hires will be provided, together with the documentation normally provided for hiring, the information necessary to maintain the culture of compliance, and specifically, their Code of Ethics. In this way, it is possible to ensure that these people know the basic rules of the organization. Upon receipt of such information, such persons shall sign it confirming their full knowledge and agreement, undertaking to comply with the principles, rules and procedures contained in said document during the performance of their duties relating to criminal proceedings and activities, as well as any other activity carried out in the interest or benefit of the organization.

- With regard to training/information, the organization aims to ensure that all recipients of the Compliance Program are aware of and disseminate the rules of conduct contained in this document, and specifically in the Code of Ethics. All recipients must be perfectly informed both about the objectives to be achieved and about the mechanisms or systems through which the organization has decided to pursue them.

- The level of training and information of the recipients may be different, being particularly relevant that which is aimed at employees who participate in the activities or processes considered "susceptible to crime". Therefore, the training/information activity has to be differentiated according to the position of the recipients and the level of risk of the area in which they work.

- The organization will assess -through the competencies set forth in the Compliance Program and its annexes- the effectiveness of the training plan, taking into account the contents of the courses, the conditions of their offer, their repetition, the control of mandatory participation and the measures taken against people who are absent without justified reason.

- To this end, the organization has taken specific measures aimed at the widest dissemination of the requirements of the Compliance Program and, consequently, at raising awareness among all personnel in order to maintain a culture of compliance.

- Therefore, it offers the following levels:

  - **Beginner level** aimed at all staff.
    This will materialize in information, awareness and training, which will be promoted after the approval of the Compliance Program.

  - **Advanced level** Classified according to professional categories. This level is aimed at the personnel who belong to the management of the organization, and will materialize in courses and individual meetings that will take place after the approval of the Compliance Program, which, unlike the previous ones, will include content related to their specific areas.

- Likewise, the control body will assess the subsequent need to carry out new courses in relation to personnel working in activities considered susceptible to crime or the eventual publication of *newsletters* or the preparation of control activities in order to verify the learning of the proposed topics.

- Participation in the above-mentioned training processes is mandatory. To check it, it is necessary to ask the attendees to sign the attendance sheet and then communicate to the competent body all the names of the participants.

- For newly hired, specific courses may be organized, subject to agreement with the corresponding area/position/service manager.

7.2. Information for suppliers, advisors and collaborators

- Suppliers, advisors and collaborators will be informed about the existence of the Compliance Program, and the need for their behavior to comply with the legislation in relation to it.

8. System of periodic external verification of compliance with this legal compliance program, as well as its adequacy to the progressive evolutions and changes of the organization over time.

- The current regulations expressly establish the need to update the Compliance Program so that the Compliance System constantly reflects the specific requirements of the entity, as well as its specific activities.

- This program must be reviewed annually. One of the main powers of the control body will be to carry out the tasks necessary for this periodic review to take place, whether annual or by any other method of lower frequency.

- To this end, the Compliance Officer will promote an annual periodic action plan, the content of which will be reviewed in its sessions in order to renew it as necessary.

- In the event that relevant violations or circumvention of the rules contained in this Compliance Program are detected that demonstrate the inability of said document to guarantee the effective prevention of the acts that constitute a crime, the administrative body must quickly modify it.

- Likewise, this body can quickly update the Compliance Program at the request of the control body whenever changes are made in the legal framework, the organization or the activity of the organization.

9. Entry into force.

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- This Compliance Program, together with its annexes, will enter into force on the day of its approval by the entity's administrative body.