



CRIME PREVENTION
POLICY.

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CRIME PREVENTION POLICY.

The Board of Directors of Valoriza Servicios Medioambientales, S.A., hereinafter, "Valoriza", within the framework of its general and non-delegable powers to determine general policies and strategies, and after review and proposal by the relevant Committee, has approved this *Crime Prevention Policy* (hereinafter, the "**Policy**").

This *Policy* is part of Valoriza's "Regulatory Compliance, Criminal Prevention and Antitrust Model" (hereinafter, the "**Regulatory Compliance Model**"). The Code of Ethics is the internal standard that forms the basis of this Regulatory Compliance Model. This *Policy* is aligned with the values of integrity and transparency set out in this Code of Ethics and constitutes a development of one of its basic ethical principles (respect for the law) and one of its expressly prohibited conducts (criminal or unlawful conduct).

Consequently, this *Policy* must be read and interpreted in conjunction with the Code of Ethics and with the other policies of Valoriza that develop it, among others, with the *Policy of Regulatory Compliance in the Defence of Competition* and with the *Anti-Corruption Policy and the Policy of Relations with Public Officials and Authorities*, which are also an expression of Valoriza's firm commitment to compliance with the law, in these cases in the field of defence of competition and anti-corruption regulations, respectively.

1. Purpose

The purpose of this Policy is:

- To formally reflect (i) Valoriza's willingness to comply with current regulations, in particular those of a criminal nature, establishing a solid corporate culture of regulatory compliance and criminal prevention among its members, and (ii) Valoriza's firm commitment to zero tolerance of any kind of unlawful or criminal act. Under no circumstances may any such act be justified by the obtaining of a benefit to the organisation or in the achievement of its objectives.
- To contribute to the effective fulfilment of Valoriza's duties of supervision, surveillance and control, laying the foundations for the establishment of suitable measures to exercise the due control that is legally required in order to prevent, detect or significantly reduce the risk of crimes being committed within the Group.

2. Scope of application

This Policy applies to:

- All the entities belonging to Valoriza, taking into account their own characteristics. For the purpose of this document, Valoriza is deemed to comprise all of the subsidiaries or majority-owned companies over which, directly or indirectly, effective control is exercised by Valoriza, regardless of their geographical location. Therefore, in all references that this

Policy makes to Valoriza, all the companies detailed above will be understood to be included.

- The members of the administrative bodies, executives and employees of all the Valoriza entities detailed above, regardless of the territory in which they are located.
- Those third parties, natural and/or legal persons, related to Valoriza, in those aspects of this *Policy* that are applicable to them and who are expected to behave in a manner that is consistent with it.

In the case of activities that Valoriza carries out outside Spain, this *Policy* must be adapted to the most restrictive local legislation that, as the case may be, is applicable.

3. Valoriza's commitment to regulatory compliance and the prevention of crime.

As reflected in Valoriza's principles expressed in its Code of Ethics, respect for legality, integrity, honesty and transparency are values that must preside over any action of its members, who undertake to maintain ethical and impeccable behaviour at all times, refraining from any illicit conduct and, in particular, with regard to this Policy. any criminal conduct, due to the particular seriousness of criminal offences.

Valoriza, by the express will of the Board of Directors, which formalises it in this Policy, makes this firm commitment and formally expresses its position of zero tolerance of any unlawful conduct and, in particular, of the commission of any crime within the scope of the activities it carries out. Thus, Valoriza firmly rejects all forms of criminality does not allow, authorise, or consent in any way or under any circumstances, to its members participation in any criminal conduct perpetrated within the scope of their responsibilities, in its name or on its behalf, and for its direct or indirect benefit.

Thus, Valoriza undertakes to conduct business with absolute respect for the applicable laws and regulations, in particular those of a criminal nature, and requires its employees and related third parties to make use only of legal, legitimate and ethical practices to achieve its objectives and those of its stakeholders, expressly prohibiting the obtaining of any economic benefit or commercial advantage in an unlawful or criminal manner.

To comply with this permanent commitment to proactively combat crime within its ranks, Valoriza has a Model of Regulatory Compliance, Criminal Prevention and Defence of Competition, in accordance with the requirements established in the applicable criminal law and in the best practices in the field. Within the framework of this Model, Valoriza has internal regulatory instruments and adequate control and management systems in the field of prevention, detection and mitigation of criminal risk, which aim at minimising the possibilities of criminal practices. These measures include those relating to information, training and awareness in the sphere of regulatory and criminal compliance. All this is in order to maintain a solid corporate culture of

respect for the law and non-commission of crimes in Valoriza that is permanently aligned with the principles declared in this Policy and in the Code of Ethics, to which any person who wishes to work in the organisation must necessarily adhere.

Along with this express commitment against criminal offences, Valoriza also maintains a specific commitment to regulatory compliance with, among others, the regulation prohibiting anti-competitive and corrupt conduct, which it also considers to be particularly reprehensible. These commitments are formally set out in the *Regulatory Compliance Policy with regard to the Defence of Competition* and the *Policy on Anti-Corruption and Relationships with Public Officials and Authorities*, respectively.

4. General principles

To achieve the implementation of this commitment, Valoriza is guided by the following general principles within the framework of the Group's Regulatory Compliance, Crime Prevention and Antitrust Model:

- a) Act, at all times, in compliance with the applicable law in force and demand this same respect for the law of all members of Valoriza and related third parties.
- b) Make the Ethical Channel set up by Valoriza available to all its members and third parties so that, through it, they can (i) raise possible queries in relation to the Regulatory Compliance Model and/or (ii) communicate, in a confidential, secure and optionally anonymous way, possible infringements of it, expressly including reporting possible criminal conduct. Communications relating to matters included in the scope of application of the Channel are duly investigated by Valoriza, guaranteeing confidentiality, the protection of informants in good faith and the rights of those affected.
- c) Communicate the existence of a disciplinary system that Valoriza applies, in accordance with the provisions of the applicable legal and/or conventional regulations, in the event of breach of the Model, such as the commission of criminal offences.
- d) Continue to promote, through appropriate information, training and awareness programmes, a solid corporate culture of compliance and criminal prevention, which focuses on the importance of each of the members of Valoriza acting at all times in accordance with the provisions of the legislation and the Regulatory Compliance Model. The main objectives of these programmes are, inter alia, to convey to them:
 - Their duty to report in good faith through the Ethical Channel, any irregular conduct of which they are aware or suspect (including possible crimes).
 - The existence in Valoriza of a disciplinary system of the Regulatory Compliance Model that entails the imposition of sanctions in the event of breaches thereof.
- e) Provide a regulatory and compliance framework with those third parties with whom Valoriza has business relationships (such as partners, customers or suppliers) in order to

ensure integrity, transparency and lawful practices, including in these relationships with third parties. Valoriza will properly exercise its due diligence obligations, prioritising collaboration with those third parties that have an effective regulatory compliance model aligned with Valoriza, also with regard to criminal prevention.

- f) Analyse the different activities carried out by Valoriza, assessing the risk that criminal acts may be committed within the scope of each of them. This criminal risk map will be updated periodically and whenever changes in regulation or deemed necessary.
- g) Continue to implement, within the framework of the control matrix associated with the criminal risk map, internal regulatory instruments and control and management systems appropriate to the reality of each of Valoriza's activities, in order to effectively prevent, detect or mitigate the risk of crimes specifically identified in each of them from being committed.
- h) Provide the Model and the bodies that make up the regulatory compliance structure designed by Valoriza, in particular the Regulatory Compliance Unit, with sufficient financial, material and human resources, as well as the autonomy, authority and independence necessary to carry out their responsibilities within the framework of the Regulatory Compliance Model.

5. Monitoring of compliance with the Policy. Action in the event of breach

The Board of Directors of Valoriza is responsible for supervising the operation and compliance with this *Policy* by all the persons and entities included in its scope of application, with the support of Valoriza's Regulatory Compliance Unit, to use the requisite operational powers to ensure its efficacy, monitoring its implementation, urging its review and promoting the information, training and awareness-raising actions necessary for its proper dissemination. Compliance with this *Policy* will also be subject to Internal Audit review.

Breaches of this Policy will be subject to the disciplinary regime that Valoriza applies in accordance with the corporate governance system, collective bargaining agreements and current laws and regulations. Anyone who detects a possible breach of this *Policy* must report it as soon as possible to the Regulatory Compliance Unit through the Ethical Channel set up as a preferential channel by the Group, without prejudice to other means of communication with the Regulatory Compliance Unit permitted by law. Through this same Channel, the Regulatory Compliance Unit will also resolve any doubts or queries about it.

The Ethical Channel is available through the following channels: Intranet: By means of the links provided for this purpose.

The Group's external website: By accessing the Channel included on the website: www.valorizasm.com.

6. Effective term

This Policy was approved by the Board of Directors of Valoriza Servicios Medioambientales, S.A., on 20 March 2024.

With its entry into force, this Protocol derogates any other internal regulation in this matter that may have existed up to now. This document shall be disseminated as appropriate through Valoriza's usual communication channels

Versions record:

DATE	EDITION	REVISION	RESPONSIBLE PARTY	CHANGES DESCRIPTION
29 November 2023	V1	Changes.	Regulatory Compliance Unit	Initial draft.
06 February 2024	V2	Changes.	Regulatory Compliance Unit	Draft V2.
06 March 2024	V3	Board Approval.	Regulatory Compliance Unit	Board Approval version.
20 March 2024	V4	Board Approval.	Board	Board Approval.