



# DONATION AND SPONSORSHIP POLICY

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## **DONATION AND SPONSORSHIP 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 Regulatory Compliance Unit, has approved this *Policy on Donations and Sponsorships* (hereinafter, the "**Policy**").

This *Policy* and the *Procedure for providing Sponsorship* which complements it, are part of Valoriza's "Regulatory Compliance, Criminal Prevention and Defence of Competition 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* and the *Procedure* that complements it are aligned with the values of integrity (honesty and transparency) set out in this Code of Ethics and constitute an implementation of one of its guidelines for behaviour with society: the one relating to anti-corruption measures.

Consequently, this *Policy* and the aforementioned *Procedure* must be read and interpreted in conjunction with the Code of Ethics and Valoriza's *Policy on Anti-Corruption and Relationships with Public Officials and Authorities*.

### **1. Purpose**

The main objectives of this *Policy* are:

- To formally establish the criteria whereby any and all donations and sponsorship that are carried out in the scope of Valoriza must be processed.
- To enable effective internal control of these activities, supervising them to ensure that in Valoriza only donations and sponsorships that comply with the applicable law and the Code of Ethics are carried out, without there being any doubts about their suitability or appropriateness.
- Contribute to strengthening the Group's firm commitment, set out in its Anti-Corruption Policy and Relations with Public Officials and Authorities, to zero tolerance of any corrupt practice or one that is contrary to its legal, regulatory or ethical obligations.
- Contribute, through making donations or providing sponsorships in the Group under these guarantees, to the achievement of its corporate purpose and the consequent creation of sustainable value for all its stakeholders.

### **2. Scope of application**

This Policy applies to:

- All the entities belonging to Valoriza, taking into account their own characteristics. For the purposes of this document, the Valoriza Group is considered to comprise all subsidiaries or majority-owned companies in 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 the Procedure that are applicable to them and who are expected to behave in a manner consistent with it (in particular, for the beneficiaries of donations or sponsorships).

In the case of donations or sponsorships carried out outside Spain, this *Policy* must be adapted to the most restrictive local legislation that is applicable, as the case may be.

### **3. Definition of applicable concepts**

**Donation:** handover of a sum of money or a good (donation in kind) by one of the parties (the donor) who offers it to the other party (the donee) without asking for any kind of consideration in return. The free handover is made for purposes similar to those listed below by way of example: the promotion of human rights, social and health assistance, the protection of the environment, the promotion of education, scientific research and technological development, the promotion and support of sport, the protection of historical and artistic heritage, the promotion or dissemination of culture and art or the care of victims of acts of terrorism or any kind of violence.

**Sponsorship:** a monetary or in-kind contribution made by one party (the sponsor) that is intended to finance an activity organised or carried out by the other party (the sponsored party), provided that the sponsor obtains some consideration in exchange for that contribution. This consideration usually consists of advertising and promoting the sponsor at the sponsored event itself.

### **4. Permitted sponsorships in Valoriza.**

Valoriza allows sponsorships to be carried out on behalf of the different companies of the Group (never anonymously) **only if they meet the following general requirements:**

- **Are permitted by the laws** of the country that is applicable in each case.
- **Their purpose is to contribute to the creation of a strong Valoriza brand** aligned with its strategy, its *Purpose, Mission, Vision* and *Values*, as well as pursuing general aims such as those described for donations in section 1 of this Policy. Under no circumstances may sponsorships have the aim of:
  - affecting or influence any commercial, professional or official institutional relationship, or any business decision, nor be linked, directly or indirectly, to unlawful or improper acts.
  - the profit, promotion or personal interest of any member of the Group.
- **They are given to entities of recognised prestige and moral integrity** without

evidence, based on the best available public information, of any facts contrary to this Code of Ethics. These entities must have the appropriate organisational structure to ensure that the resources contributed are well managed and that they are used for the sponsored event or activity.

- **They are not contrary to the values adopted by Valoriza in accordance with its Code of Ethics.** Are done in an open and transparent way.
- Do not damage the reputation and image of VALORIZA, nor its businesses.
- **If they meet all the above requirements, they are permitted once they are authorised following the prior approval and implementation procedures** described in the *Procedure for providing Sponsorships*, which serves to implement this Policy.

## 5. Prohibited sponsorships in Valoriza.

Sponsorships are prohibited in Valoriza **if they do not meet the general requirements described in the previous section.** In particular, **by way of example**, the following are prohibited:

- **Sponsorships of disproportionate** or unreasonable **amounts** such as:
  - Those in which the value of the consideration obtained by the Group company that acts as sponsor (for example, the value of the advertising actions to be carried out by the sponsored party), constitutes an amount lower than the amount contributed by this company.
  - Those made in favour of entities that maintain or may maintain relations with Valoriza (for example, potential customers), in which the amount contributed by the Group's sponsoring company could be considered significant in relation to the amount of the contracts signed (or that could be signed) with the beneficiary entity.
- **Sponsorship of political parties**, their foundations, trade unions or of congresses and similar events (for example, acts of candidates for public office) that are conducted in the terms that are not expressly permitted by the law of the country in which they are held.
- **Sponsorships carried out by means of cash contributions.** All cash sponsorship must be issued directly to a bank account held by the sponsored party, never through third party intermediaries.

## 6. Monitoring of compliance with the Policy. Action in the event of breach

It is the responsibility of Valoriza's Board of Directors, with the support of the Regulatory Compliance Unit, to ensure due compliance with this *Policy* by all persons and entities within its scope of application, monitoring its implementation, calling for its review and ensuring

the information, training and awareness-raising actions necessary for its proper dissemination. Compliance with this *Policy* shall also be subject to Internal Audit review.

Infringements of this *Policy* shall be subject to the application of Valoriza's disciplinary regime. Anyone who detects a possible breach of said regime must report it as soon as possible to the Regulatory Compliance Unit through the Ethics Channel set up by the Group as a preferential channel, without prejudice to other means of communication with the UCN permitted by Law. Through this same channel, the UCN will also resolve any doubts or queries about it.

The Ethics 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](http://www.valorizasm.com)

## 7. Entry into force

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.