



PROCEDURE FOR PROVIDING SPONSORSHIP

CONTENTS

PROCEDURE FOR PROVIDING SPONSORSHIP -----	2
Purpose -----	2
1. Scope of application -----	3
2. Definition of applicable concepts-----	3
3. Procedure for the prior authorisation of sponsorships allowed in Valoriza	3
4. Method of carrying out authorised sponsorships.-----	4
5. Control of compliance with the Procedure. Action in the event of breach	5
6. Effective term -----	5
Annex 1: Sponsorship Authorisation Request Form -----	7
Annex 2: Requirements to be met by the Proposed Sponsorship-----	9
Agreement-----	9

PROCEDURE FOR PROVIDING SPONSORSHIP

This *Procedure for Sponsorships* (hereinafter, the "**Procedure**"), which complements the *Donations and Sponsorships Policy* of Valoriza Servicios Medioambientales, S.A., hereinafter, Valoriza, is approved by the Board of Directors, with the approval of the Regulatory Compliance Unit.

Both documents, *Policy* and *Procedure*, are aligned with the values of integrity (honesty and transparency) promulgated in Valoriza's "Code of Ethics", the basis of its Model of Regulatory Compliance, Criminal Prevention and Defence of Competition of Valoriza" and with the *Anti-Corruption Policy and Relationship with Public Officials and Authorities*, which also implements this Code of Ethics. Consequently, all these documents must be read and interpreted together and become part of the Regulatory Compliance Model.

Purpose

The main objectives of this *Procedure* are:

- Complement Valoriza's *Donations and Sponsorships Policy* by formally establishing the procedure that must be followed by all sponsorships allowed in the Group in accordance with said *Policy* in order to be carried out. Specifically, this *Procedure* details (i) the procedures through which prior authorization must be obtained to carry out the permitted sponsorship and (ii) the way in which, once authorised, such sponsorship must be carried out.
- Enable effective internal control of the sponsorships carried out in Valoriza, supervising that only sponsorships that comply with the applicable law and the Code of Ethics are carried out, without there being any doubts about their suitability or adequacy.
- Contribute to strengthening Valoriza'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 contrary to its legal, regulatory or ethical obligations.
- Contribute, through sponsorships in the Group subject to these guarantees, to the achievement of its corporate purpose and the consequent creation of sustainable value for all its stakeholders.

1. Scope of application

This *Procedure* 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 *Procedure* makes to the Valoriza Group, 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 the sponsorships).

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

2. Definition of applicable concepts

For the purposes of this Procedure, the same concept of sponsorship described in Valoriza's *Donations and Sponsorships Policy* is used.

3. Procedure for the prior authorisation of sponsorships allowed in Valoriza

Any sponsorship intended to be carried out by any entity of the Group included in the scope of this document must necessarily be authorised, before it is implemented, through the prior authorisation procedure detailed below:

- A. Whoever wishes to carry out the sponsorship (applicant) must fill in the "**Sponsorship Authorisation Application Form**" included in Annex 1 of this *Procedure*.
- B. This Form must be accompanied by the "**Sponsorship Agreement Proposal**" which must meet the requirements indicated in Annex 2.
- C. This Form must be sent to be **signed** by the **Legal Department**, and its signing (accompanied by the selection of the "AUTHORIZED" field) indicates a first approval of the proposed sponsorship (i) as it meets the general requirements set out in the Group's *Donations and Sponsorships Policy* and (ii) it does not give rise to any cause of prohibition detailed therein. Failure to provide this first signature will result in the rejection of the requested action.

- D.** Applicants for sponsorships who have passed this first approval by the Legal Department must send the duly **signed form for the attention of the Regulatory Compliance Unit**, which may request as much information as it deems relevant to validate the sponsorship and may also request the collaboration of areas (such as Communication) in order to assess the proportionality between the amount to be contributed and the intended return.
- E.** Additionally, in the event that the value of the sponsorship is more than €10,000 (or its equivalent in local currency), the sponsorship must be submitted for approval by the Regulatory Compliance Unit.

Based on all this information, the Regulatory Compliance Unit may approve or reject the proposed action. If approved the Regulatory Compliance Unit will sign off on the Application Form included in Annex 1 (with the selection of the "AUTHORISED" field), and will inform the applicant, sending him/her the form with all the signatures. If rejected, the applicant will also be informed and must refrain from carrying out the requested sponsorship.

- F.** **If it is finally approved, the sponsorship must be carried out under the same terms** as those reported in the "Sponsorship Authorisation Application Form" that it has been authorised and in the manner indicated in section 5 of this *Procedure*. Failure to comply with any of these points will result in its rejection by Valoriza.
- G.** The Regulatory Compliance Unit and the Legal Department will keep a **record of all sponsorship requests received**, as well as the decision taken regarding them and all related supporting documentation.

4. Method of carrying out authorised sponsorships.

Once sponsorship is authorised in accordance with the above procedure, it is the responsibility of the sponsorship applicant to ensure:

- A.** That the sponsor and the sponsored party formalise in writing and sign a "**Collaboration Agreement for Sponsorship**" coinciding with the "Proposal for a Sponsorship Agreement" that was authorised according to the procedure described in the previous section.
- B.** **The sponsorship applicant must clearly communicate to the relevant Administration Department** all information related to the sponsorship, providing its internal approval as well as the Agreement signed by both parties, so that it can be accurately recorded in the relevant accounting books and records of Valoriza.
- C.** **In the case of sponsorship in the form of money, the sponsor applicant must ensure that the relevant Treasury Department** makes the contribution through bank transfer to the sponsored, in accordance with the information included in the agreement itself and requesting from this department the proof of said

transfer for its files.

D. The applicant for sponsorship must duly file, during the time allowed by the applicable law, **all the supporting documentation** related to the sponsorship and, especially, that related to its internal approval, the original copy of the signed agreement and the receipts for the delivery of the scope it consists of and of the items carried out in return for the sponsorship.

5. Control of compliance with the Procedure. Action in the event of breach

The Board of Directors of Valoriza is responsible for supervising the operation and compliance with this Procedure by all the persons and entities included in its scope of application, with the support of the Regulatory Compliance Unit by monitoring its implementation, calling for its review and arranging the information, training and awareness-raising actions necessary for its proper dissemination. Compliance with this *Procedure* will also be subject to Internal Audit review.

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

6. Effective term

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

With its entry into force, this Procedure 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.

Annex 1: Sponsorship Authorisation Request Form

[Editable version of the authorization request form available on Valoriza intranet]

ANNEX 1: SPONSORSHIP AUTHORISATION REQUEST FORM		
Details of the application (to be filled in by the relevant Compliance Officer/Manager for the purposes of filing)		
Application code: <input type="text"/>		
Applicant's details (to be filled in by the applicant who wishes to carry out the sponsorship)		
Full name, Position and Department: <input type="text"/>		
Sociedad Grupo Valoriza, Business Line: <input type="text"/>		
Workplace: Country: <input type="text"/>		
Sponsorship details (to be filled in by the applicant who wishes to carry out the sponsorship)		
General description of the sponsorship (Including sponsored activity and expected date) <input type="text"/>		
How did the possibility of doing it come about? <input type="checkbox"/> Internally <input type="checkbox"/> At the beneficiary's request <input type="checkbox"/> At the request of a third-party		
non-beneficiary What is expected to be obtained in return: <input type="text"/>		
Fill in for monetary sponsorships only: <input type="text"/> Amount contributed as sponsorship		
Fill in for in-kind sponsorships only: <input type="text"/> Service to be provided		
Details of the beneficiary of the sponsorship (to be filled in by the applicant who wishes to carry out the sponsorship)		
Full sponsor identification and details: <input type="text"/>		
Individual or corporate tax ID no., directorate, activity... <input type="text"/>		
Type of beneficiary: <input type="checkbox"/> Nat. Pers. <input type="checkbox"/> Legal Pers. <input type="checkbox"/> Association/Foundation (tick all that apply) <input type="checkbox"/> Political party, trade union or similar entity <input type="checkbox"/> It is a customer <input type="checkbox"/> It is a partner <input type="checkbox"/> It is a supplier/subcontractor/agent <input type="checkbox"/> could become a customer, partner, supplier/subcontractor/agent <input type="checkbox"/> Other (please specify)		
Has the beneficiary received donations/sponsorships from the Group before? (Provide details of when and what was received) <input type="text"/>		
Attached documents (to be filled in by the applicant who wishes to carry out the sponsorship)		
<input type="checkbox"/> Sponsorship Agreement Proposal (Annex 2) <input type="checkbox"/> Beneficiary Annual Accounts <input type="checkbox"/> Other (specify)		
Assessment by the Legal Department (to be filled in by the Head of the Legal Department)		
I confirm, by signing this application, that: (mark with an "X" where applicable)		
<input type="checkbox"/> <u>The requested sponsorship complies with the general requirements set out in section 5 of the Group's Donations and Sponsorships Policy:</u> <ul style="list-style-type: none"> • This is permitted by the laws of the applicable country. • Its main purpose is to strengthen the Grupo Valoriza brand, but under no circumstances is it intended to: <ul style="list-style-type: none"> - affect/influence commercial, professional or institutional relationships. It is not linked to unlawful acts or improper benefits. - nor is it linked to any advantage, promotion or personal interest of any member of the Group. • It is awarded to entities of prestige and moral integrity, with no history that runs contrary to the Code and that possess the requisite structure to be able to manage it. • It is not contrary to the values set out in the Valoriza Group's Code of Ethics. It is done in an open and transparent way. • It does not harm the reputation and image of the Valoriza Group, nor its businesses. 		
<input type="checkbox"/> <u>The sponsorship requested does not fall under any of the prohibitions detailed in section 6 of the Donations and Sponsorships Policy:</u> <ul style="list-style-type: none"> • The amount contributed by the sponsoring company is not greater than the value of the return that is intended to be obtained with the sponsorship. • If the sponsored company has (or could have) relations with the Group, the amount contributed by the sponsoring company cannot be considered significant in relation to the amount of the contract that has been signed (or may be signed) with the beneficiary. • It is not a sponsorship of political parties, trade unions or similar entities; or, if it is, it is permitted by applicable local law. • It is not intended to be made by handing over cash. If it is monetary, it will be carried out by direct bank transfer to the beneficiary. 		

The Proposed Sponsorship Agreement accompanying this Application complies with the requirements of Annex 2 of the Procedure.

Requester: 	First Authoriser: Dir. AUTHORISED Relevant Legal <input type="checkbox"/> Department <input type="checkbox"/> REJECTED Date: _____ Full name _____ Signature _____	Second Authoriser: Regulatory Compliance Unit - UCN AUTHORISED <input type="checkbox"/> REJECTED Date: _____ Responsible Party for Regulatory Compliance _____ Signature _____
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NOTE:

The applicant must fill in the yellow cells, all of which must be filled in.

Annex 2: Requirements to be met by the Proposed Sponsorship Agreement

The "Proposed Sponsorship Agreement" (or "Sponsorship Collaboration Agreement") that accompanies the "Sponsorship Authorisation Request Form" in Annex 1 of this Procedure, will serve as a written formalisation of the agreement reached between sponsor and sponsored and must meet the following requirements:

1. Expressly contain the word "sponsorship", ideally in the name of the document itself, which is recommended to be "Sponsorship Collaboration Agreement", "Sponsorship Agreement" or similar.
2. It must include clauses relating to the following matters with the content indicated herein:
 - 2.1. With regard to the event or activity that is intended to be sponsored: that it is sufficiently detailed, stating, among other information, the dates and the place where it will take place.
 - 2.2. With regard to the contribution made by the sponsoring company of the Valoriza Group:
 - 2.2.a. that it is sufficiently specified what this contribution will consist of, detailing the amount to be contributed by the company of the Valoriza Group in the case of monetary sponsorships, or the item(s) to be contributed (or the provision of services that this company is going to perform) in the case of sponsorships in kind.
 - 2.2.b. that express mention should be made to the effect that the amount contributed by the sponsoring company of the Valoriza Group, in the case of monetary sponsorships, will be used in its entirety by the sponsored party for holding the sponsored event or activity, with the sponsoring company reserving the power of inspection to monitor the contribution made in order to verify its correct allocation or use, otherwise the contribution may be revoked.
 - 2.2.c. that express mention be included that, if the sponsorship is monetary, the delivery of this money by the sponsor will always be made by bank transfer (never in cash), sufficiently documented and issued directly to a bank account held by the sponsored party, never through third party intermediaries.
 - 2.3. With regard to the return that the Group company intends to obtain with the sponsorship:
 - 2.3.a. that it is sufficiently specified what this return will consist of. Specifically, in the event that it consists of the advertising and promotion of the sponsoring company:
 - it will be necessary to detail the specific advertising actions that the

sponsored party is going to carry out, in addition to expressly including in the agreement that the management is signed so that the sponsored party can request material necessary to carry out the specific advertising actions which it has committed to carry out.

- it shall be recommended that, in order to better substantiate the possible tax deductibility of the accounting expense generated by the advertising sponsorship, the relevant Tax Department should be consulted, to ensure that the sponsorship agreement/agreement is signed in accordance with the provisions of the applicable regulations. In particular, for sponsorships signed in Spain, according to the General Advertising Act, it will be advisable to state the purpose of the sponsorship contract in words similar to the following: *"By virtue of this Contract, the sponsored party, in exchange for financial assistance for the performance of its activity (specify: sports, charitable, cultural, scientific or of any other nature) undertakes to collaborate in the sponsor's advertising. In particular, the sponsored party undertakes to (expressly indicate the advertising actions to be carried out)".*

2.3.b. that express mention should be made to the fact that it is the sponsored party that undertakes to provide the sponsoring company of the Valoriza Group with sufficient support if it has carried out the specific advertising actions to which it has committed.

2.4. Other clauses to be included:

2.4.a. It should be noted that, for all third parties related to Valoriza, such as those sponsored by the Group, they are expected to behave in a manner consistent with the content of the Code of Ethics in all matters applicable to them. The current version of the Code can be found at www.valorizasm.com

2.4.b. Compliance with and subjection to applicable law and any regulations deemed appropriate relating to good business practices; the sponsor must ensure that the sponsorship will not act as a conduit to finance any illegal or corrupt activity and, in particular, any activity that breaches anti-money laundering and terrorism financing regulations.