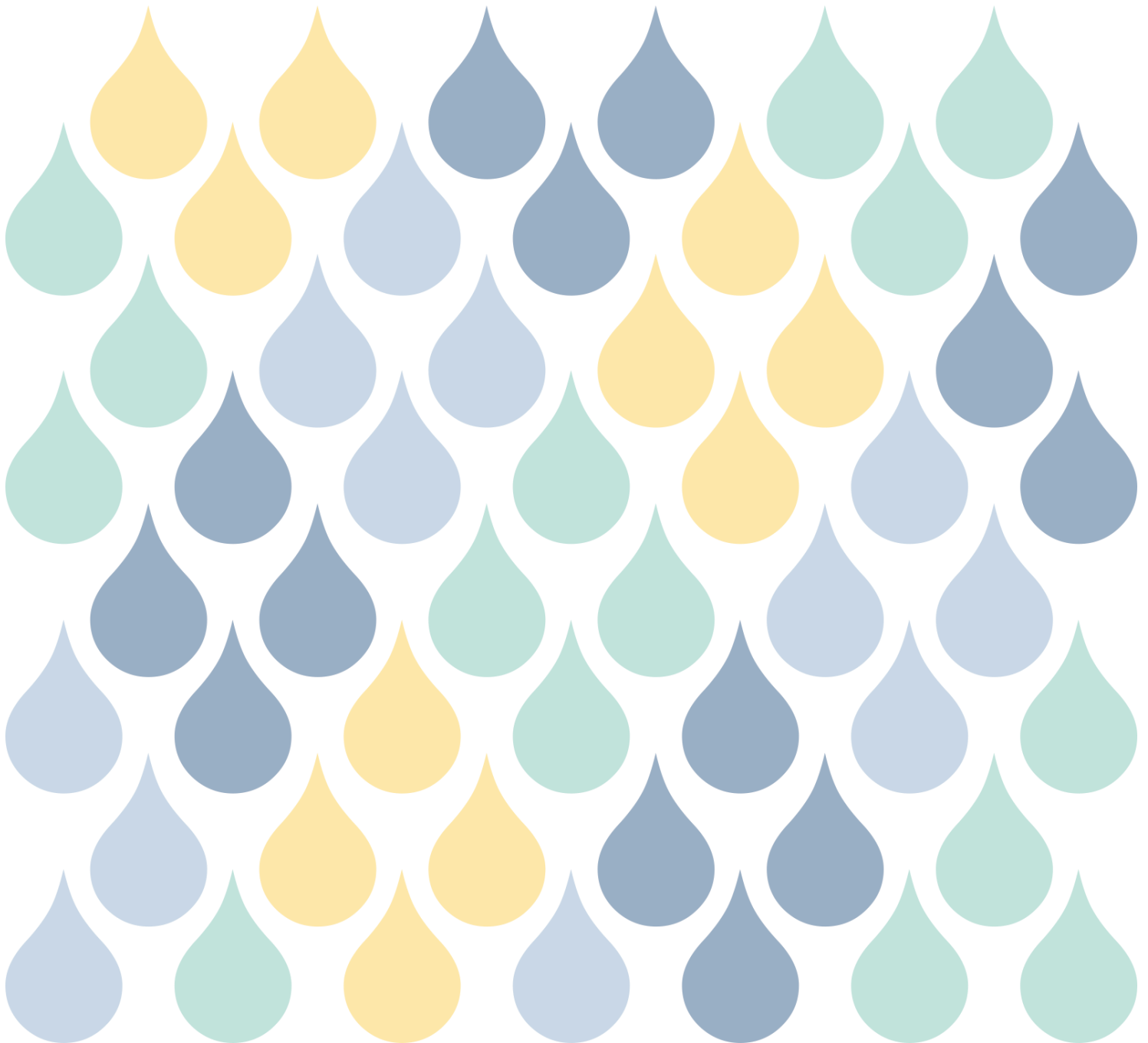




CORPORATE COMPLIANCE PROGRAM



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1. Introduction

1.1. Objective of FISAIR's criminal and anti-bribery Compliance program

The Compliance program presents in a structured manner the measures adopted by the organization to prevent, detect and manage compliance risks. Its objective is to achieve the Compliance Objectives at both strategic and operational levels. This program is based on the Code of Ethics and Conduct and establishes the organization's commitment to strict compliance with applicable obligations. It also designates those responsible for the governance of the compliance management system and describes the obligations and commitments of all members of the organization in relation to this program, including the reporting of non-compliance and its consequences. The implementation of these measures seeks to foster a culture of compliance throughout the organization and among business partners.

1.2. Entities, persons and activities affected

This program is addressed to its executives, managers and in general to all FISAIR personnel, regardless of their position or work location. The behavioral guidelines included in this program are mandatory and apply to all affiliated companies in which FISAIR has management control. FISAIR or the FISAIR Group should be understood as the group of commercial entities integrated by FISAIR S.L.U and its subsidiaries: FISAIR IBÉRICA S.L.U and TECNISECO INGENIEROS S.L.

When appropriate, FISAIR may request its suppliers, collaborators and partners to formalize their commitment to comply with this program or with the established guidelines. Likewise, the application may be extended to any person or organization related to FISAIR when the company considers it appropriate and the nature of the relationship allows it.

2. Legal and regulatory framework

The program has been prepared following a method that seeks to adapt the identification of criminal risks to the specific characteristics of our Group. To achieve this, a thorough analysis of the day-to-day operations of each member company has been carried out, examining their usual practices, operating procedures and compliance with the internal and legal regulations applicable in their respective fields of activity.

Following this, the criminal risks associated with the activities of each entity have been identified and classified according to their potential impact and probability of occurrence. This approach has taken into account both the risks inherent to the very nature of our companies and those arising from the particularities of the industrial and commercial sector in which we operate, as well as the challenges inherent to the production model of each entity.

In order to guarantee an adequate response to possible breaches of the established prevention systems, a disciplinary system has been designed to define how companies should act in such situations. Likewise, corrective measures have been established and may be implemented in the event of a crime committed by any person linked to any of the Group's companies or if the obligations required in terms of regulatory compliance are breached.

In line with our firm conviction to promote an ethical and transparent corporate culture, we have created a specific communication channel called "ethical or whistleblower mail". This channel provides any individual with the possibility of reporting possible violations of current regulations that may affect the Group in any way. This tool will facilitate the conduct of relevant investigations and the adoption of appropriate measures in response to the complaints or communications received. To ensure effective supervision, a control and supervisory body has been set up, which operates jointly between the various Group companies. This body will also be responsible for instructing, classifying, filing and managing the complaints received.

Finally, in order to maintain the validity and effectiveness of this Protocol, mechanisms for periodic updating and monitoring are in place. Our main objective is to maintain a responsible and safe business environment, where integrity and regulatory compliance are fundamental pillars that drive the sustainable and ethical development of all our operations in the Group.

2.1. Methodology

In order to effectively manage the risks identified, they are classified according to their impact and probability of occurrence. Both the risks inherent to each company and those associated with their respective industrial sectors are taken into account.

Probability	Very high	4	8	12	16
	High	3	6	9	12
	Medium	2	4	6	8
	Under	1	2	3	4
	Under	Medium	High	Very high	
Impact					
	Risks rated 1 and 2				
	Risks rated 3 and 4				
	Risks rated 6 and 9				
	Risks with rating > 12				

Considering the probability and impact, it is possible to determine the level of each future risk. In order to prevent high and very high risks, it is essential to implement control measures in an agile and effective manner. A maximum term of 6 (six) months is established for the implementation of these controls. The risks with the highest impact and probability are prioritized, taking quick measures to prevent their materialization. Medium probability risks also receive timely attention, while low probability risks are continuously controlled and monitored in the medium term. This approach seeks to safeguard the integrity and stability of the organization in the face of possible future adversities.

2.2. Existing control mechanisms

FISAIR has established an Occupational Risk Prevention Plan based on the Risk Assessment Report and Preventive Action Planning. These models are applied to all work centers and workers of the company.

In addition, a Psychosocial Factors Assessment has been carried out to identify risks to the health and well-being of workers. This allows an adequate planning of preventive actions in compliance with the Occupational Risk Prevention Law.

FISAR also has an Equality Plan and Equality Action Plan designed to reiterate FISAIR's commitment to compliance and the development of ethical behavior. These plans include guidelines, procedures and tools to manage investigations into offenses such as abuse of authority, physical, psychological or moral harassment. They seek to create an inclusive work environment and promote gender equality through the use of codes of good practice, inclusive language and protocols for dealing with sexual and gender-based harassment.

With regard to natural resources and the environment, FISAIR strictly complies with environmental regulations and carries out an exhaustive control of stored materials and equipment. The process of identifying environmental aspects begins by identifying the company's operations that may have an impact on the environment. For each identified operation, aspects such as the consumption of materials, water, energy and fuels, water discharges, waste, atmospheric emissions, noise and soil contamination are evaluated. Once the environmental aspects have been identified, their importance is evaluated under different conditions, both normal and abnormal, and in emergency situations.

3. Ethics channel/whistleblower channel.

FISAIR has established a specific channel for the communication and reporting of possible irregularities or non-compliance. Employees can make use of this channel through the Whistleblower Model provided by the company or through the e-mail address compliance@fisair.com. This measure aims to foster a culture of transparency and ethics, encouraging all collaborators to report any situation that may violate the policies or principles of FISAIR's Compliance System.

These communications will be received only by the person in charge of the Compliance Officer. In case the reported person is the person in charge of managing this mail, the report will be processed through a form deposited in the mailbox of complaints and suggestions through the mail fisair.buzon@gmail.com.

In order to be accepted and properly processed, the communications or complaints must necessarily include the information contained in the Complaint Form (available on the intranet):

I. Person reporting the facts (In case of a harassment complaint, person who has suffered the harassment).

II: Data of the denounced person.

III: Description of the facts: Including an account of the facts denounced, attaching the necessary numbered sheets, including dates on which the facts took place whenever possible.

IV: Witnesses and/or evidence: In case there are witnesses indicate name and surname, and attach any means of evidence you deem appropriate.

V: Request: Signature of the complainant and date

3.1. Processing of complaints

Once the report or complaint has been received, the Compliance Officer will be in charge of initiating the corresponding investigations. In order to guarantee the

impartiality and objectivity of the process, if the communication or complaint involves any of the persons who are part of the investigating body, this person will be immediately replaced by another competent and neutral person. This measure is implemented to ensure that the inquiries are conducted in a transparent and fair manner, protecting the interests of both the complainants and those involved.

3.2. Investigation procedure

The procedure consists of the following steps:

a) Complaint reception and registration: Any person may report offenses or violations of the Code through the e-mail address indicated or by submitting the completed Complaint Form to the Compliance Officer.

b) Admissibility analysis: The person responsible for Regulatory Compliance will gather preliminary background information and analyze the viability of the complaint. Different actions will be taken depending on the case:

- For operational or management complaints, they will be referred to the appropriate area of the company for response and action.
- For reports of infractions or offenses, an investigation will be opened according to the established procedure.

The declaration of admissibility must be made within a maximum period of 15 working days after the Compliance Officer is informed.

c) Investigation of the reported facts: The Compliance Officer will conduct the investigation within 20 working days, issuing the Investigation Report. Necessary activities will be carried out, such as interviews, expert opinions and hiring of external advisors if necessary.

d) Investigation Report: The compliance officer shall prepare a report which shall include background information, proceedings carried out, conclusions and recommendations. This report shall be sent to the head of the decision-making body.

e) Evaluation of measures: The person in charge of the decision-making body shall take corresponding actions, such as legal actions, disciplinary sanctions or corrective measures in the procedures or controls with identified weaknesses.

f) Resolution and notification: Once the resolution has been issued, the compliance officer or the person in charge of the decision-making body shall communicate to the reported party, within 5 working days, the result of the investigation and the actions to be taken. All deadlines mentioned are working days, excluding Saturdays, Sundays and holidays. The head of the decision-making body must supervise this procedure at all times.

3.3. Appointment/removal of compliance officers

The Protocol establishes that the Compliance Officer will be selected at the discretion of the Board of Directors of each of the companies belonging to the group. At the time of the entry into force of this Protocol, this position will be held by the QHSE Manager, who will represent all the companies of the group. The Compliance Officers shall hold office for an indefinite period of time, unless the Board of Directors of each company decides to revoke such positions.

The permanence of the Officer in their position shall depend on their diligent performance and adherence to the provisions of this Protocol. In order to evaluate their performance, an annual review shall be carried out by the administrative body of each company. This evaluation will ensure that they effectively fulfill their responsibilities and guarantees compliance with the program and procedures set forth in the Protocol.

It is important to note that this designation and periodic evaluation guarantee the suitability and efficiency of the Head of Regulatory Compliance in each group company, ensuring effective compliance with applicable internal and external regulations and fostering a culture of ethics and transparency in all group operations.

3.4. Confidentiality and non-retaliation commitments

The Compliance Function assumes the irrevocable commitment to safeguard the absolute confidentiality of all facts and data provided to it, whether in the context of consultations or complaints, with respect to third parties outside the process. Any confidential information that comes to its knowledge will be treated with the strictest confidentiality, guaranteeing the privacy of those involved and protecting the identity of the complainants, if any.

It is essential that the Compliance Function complies with its duty of confidentiality, unless it is obliged to disclose information by virtue of applicable laws, requests from public authorities or judicial requirements. In such exceptional cases, we will proceed in full compliance with legal frameworks and communicate appropriately to the parties involved.

In addition, the Compliance Function is committed to implementing all necessary measures to ensure the total absence of retaliation against any individual who initiates a report in good faith. Those who, in the exercise of their ethical and moral duty, report possible infractions or improper behavior within the organization will be protected.

The company is committed to promoting a culture of openness, transparency and trust, fostering an environment in which all employees and members of the organization feel safe and motivated to raise concerns or complaints without fear of retaliation.

4. Sensitization and training

The promotion of an organizational culture rooted in ethics and compliance rests on two fundamental pillars: awareness and training. Through carefully designed training programs, we seek to create a solid understanding among all employees and stakeholders of the crucial importance of complying with laws, regulations and internal company programs. These programs are not limited only to legal and regulatory issues, but also address ethical issues and corporate values. This, in turn,

reinforces understanding of the risks associated with non-compliance and underscores individual and collective responsibility in preventing inappropriate behavior.

Compliance training empowers employees to make informed and ethical decisions in their daily activities, contributing to an environment characterized by trust, transparency and respect for the legal framework and the company's fundamental principles.

This investment in education not only broadens knowledge about legal issues and the rules of the game, but also empowers individuals with the tools necessary to discern between ethical and unethical options, fostering choices that protect both personal integrity and the overall reputation of the organization. In essence, this educational strategy not only establishes a solid foundation of knowledge, but also lays the groundwork for a business community that is more aware, upright and proactive in promoting ethical values and adherence to legal standards.

5. Audit and verification of the Compliance plan

Article 31 bis of the Criminal Code establishes the obligation for companies to carry out periodic verifications of their criminal risk prevention plan (Compliance). These checks must be duly documented in the plan and may be scheduled or arise in response to internal or external changes. The legislation allows companies to choose the type of reviews that best suit their specific needs.

In the case of FISAIR, a key element of its Compliance System is the Internal Audit Function, which has several objectives. Among them, to effectively and independently supervise the Group's risk management, including those related to potential criminal risks. In addition, it seeks to promote the existence of adequate programs, procedures and controls through conclusions and recommendations. It is also responsible for reviewing the homogeneous and efficient application of the programs and procedures that make up the internal control system of the companies and assisting them in meeting their strategic objectives and improving their processes.

Consequently, FISAIR implements an organizational and management model with adequate surveillance and control measures to prevent crimes and infractions, significantly reducing the risk of their commission.

In addition to periodic verifications or audits, it is essential for the company to be alert to any changes in its structure, such as changes in shareholding or in the management team, or to changes in the legal framework, which may also require a review of the compliance plan.

The legislation does not specify which body should carry out the verifications, which gives companies the flexibility to appoint an internal body or use an external third party, such as an auditing firm, to carry out these tasks.

A documented record of the verifications carried out, both periodic and those arising from specific situations, is essential. These records are important for demonstrating compliance and assessing the company's progress in preventing criminal risks.

6. Review, update and communication of the compliance program

This program, like the Code of Ethics and Conduct, is a constantly evolving document and is generally updated annually to ensure its relevance and effectiveness. This update is carried out taking into account several crucial aspects:

First, consideration is given to recent regulatory and legal requirements that may arise within the entity's operational scope. It is essential to keep abreast of legal changes and ensure full compliance with all relevant regulatory provisions. In this way, FISAIR is in a position to proactively adapt to new legal frameworks and ensure compliance with all legal obligations.

Additionally, improvements derived from compliance evaluations are assessed. Through analysis and internal audits, areas for improvement and possible weaknesses are identified in relation to compliance with the ethical principles and standards established in the Code. These evaluations enable the collection of valuable feedback and learning from previous experiences, leading to continuous updates and improvements.

Likewise, best practices in the field of business ethics and regulatory compliance are taken into account. FISAIR seeks to keep abreast of the latest standards and approaches to ethics and compliance, both at the industry level and in the wider business context. Market-leading practices are analyzed and studied and those that are relevant and beneficial to the entity are adopted.

The Compliance program, as well as the Code of Ethics and Conduct, is available to all members through the intranet. Updates are notified by e-mail, ensuring that all employees are aware of changes. This combination of access and notification promotes transparency and constant updating of policies and behaviors throughout the organization, strengthening a strong corporate culture based on shared values and compliance at all levels.

7. Disciplinary regime

In accordance with the provisions of this program, all professionals in FISAIR, regardless of their professional category or geographic/functional location, have the responsibility to comply with the principles, programs and procedures that are part of the FISAIR Compliance System.

FISAIR has implemented a Compliance Sanctioning Regime, which serves as an internal guideline to demonstrate the effective implementation of the Compliance System in all FISAIR entities. This regime allows sanctions to be applied, in accordance with applicable labor laws or regulations, in the event of non-compliance or violations of FISAIR's Compliance System. The elements that make up this Sanctioning Regime include FISAIR's Code of Conduct and internal procedures, as well as applicable laws and regulations. In addition, this regime complements the procedures for consulting the Code of Conduct and investigating complaints, which also contributes to the prevention and detection of regulatory risks. Each non-compliance will carry with it a sanction along with its possible impacts:

- For the most serious breaches, which must necessarily constitute a crime, as well as for breaches of the specific duty to bring to the attention of the supervisory body any non-compliance that may have been detected, the employee under investigation may be temporarily suspended from employment by means of paid leave during the time the internal investigation file is being processed, so as not to hinder the company's or the Compliance Officer's investigation work in order to gather proof or evidence of the possible infringement, or even dismissal. All this according to what the head of the decision-making body considers, depending on the seriousness of the matter and always respecting the applicable regulations.
- For less serious infractions, the person responsible may be reprimanded with a warning or by means of a disciplinary sanction of a labor nature. All of the above is at the discretion of the person in charge of the decision-making body, depending on the seriousness of the matter and in compliance with the applicable regulations.