



Anti-Corruption Protocol

February, 2024

AREAS MESSAGE

Corruption prevention as a pillar of our social strategy

The **Anti-Corruption Protocol** responds to the organization's commitment to act in accordance with the mission, vision and corporate values that regulate our business activity. That is why from AREAS we assume a public commitment based on the principles of integrity and transparency; principles that are part of our social strategy.

This Protocol is born as a reflection of our respect for the most absolute legality and in line with national and international guidelines for the fight against corruption and bribery. That is why in our activity we must always and without exception, prioritize the **principle of zero tolerance** to any action that violates the values contained in our **Code of Ethics**, especially those behaviours that promote or encourage the execution of acts that could be considered as corruption and bribery.

Through this Protocol we define in a very practical way the behavioural guidelines that should govern the activity of all our professionals. We are committed to the prevention of corruption, and that is why, from the Management of AREAS, we encourage you to read our Anti-Corruption Protocol carefully.

With no other particulars,

Chief Executive Officer

AREAS GROUP

GENERAL ASPECTS

1. PURPOSE OF THE PROTOCOL

The purpose of this **Anti-Corruption Protocol** (hereinafter, the "Protocol") is to show AREAS' firm condemnation of any conduct that may be considered acts of **corruption or bribery**, both in its public and private aspects.

It also defines the main guidelines of behaviour that should govern the professional activity of all our professionals, prohibiting any type of conduct that, in general terms and directly or indirectly, could pose a risk to the organization.

2. SCOPE OF THE PROTOCOL

This Protocol has a corporate scope, being mandatory for **all members of the Board of Directors, Management Team and professionals of the AREAS Group** (hereinafter, "AREAS" or the "Group", indistinctly).

Likewise, **all subsidiaries and affiliates of AREAS** must comply and enforce compliance with this Protocol, regardless of their geographical location.

Additionally, all third parties that intermediate, collaborate or participate in transactions, operations and business on behalf of and for the account of AREAS shall observe the guidelines and principles contained in this Protocol. To this end, AREAS is responsible for defining, developing and implementing the necessary mechanisms and instruments to ensure coordination among all agents.

CONDUCT GUIDELINES

Our conduct as professionals of AREAS must be guided by the principles and values enshrined in the Group's **Code of Ethics**, acting in accordance with the behavioural guidelines described in this Protocol and, in any case, always in accordance with our general duty of loyalty and honesty to the Group.

3. GIFTS, INVITATIONS AND HOSPITALITY

3.1 General conduct guidelines

Within the framework of our commercial and business relationships, certain circumstances may arise that may lead to the delivery, offering or receipt of any gifts, presents or commercial and entertainment invitations.

In line with the principles enshrined in our Code of Ethics, any hospitality offered and/or accepted by AREAS personnel must serve **lawful, adjusted and**

proportional purposes, in accordance with normal standards of courtesy and ordinary business practices.

Notwithstanding the foregoing, in accordance with best practices, AREAS has defined a general procedure related to the receipt and delivery of gifts, invitations or hospitality, included in the Group's Code of Ethics.

3.2 Prohibited conduct

In accordance with the foregoing, the **delivery or acceptance of gifts and invitations exceeding the above limits, of excessive economic value**, or that imply an unjustified consideration are considered prohibited conducts.

4. TRAVEL AND ENTERTAINMENT EXPENSES

Any expense derived from meals, travelling and trips shall be essentially for **work-related reasons**. These expenses shall meet **criteria of austerity and proportionality**, in accordance with the **internal applicable rules** to each of the local Business Units.

5. OTHER SPECIAL EXPENSES

5.1 Charitable contributions, sponsorships, patronage and other related items

Any contribution of any nature made in the name and on behalf of AREAS shall comply with the corporate **Sponsorship and Donations Policy**.

Any charitable contribution, sponsorship, patronage or similar shall be subject to the internal approval procedure, including authorization by the *Compliance and Internal Control Commission* (CICC), Management Team and Communication and Legal Departments.

5.2 Political contributions

AREAS does not position itself with any specific political affinity. In this sense, it is forbidden to make any type of contribution, in the name and on behalf of the organization, that may have political implications of any nature.

5.3 Lobbying activities

Lobbying activities are permitted as long as they do not constitute, or may constitute, an irregularity and/or violation of local legislation, as well as of the Group's internal regulations. Therefore, as professionals of AREAS we must always comply with the highest standards of honesty, integrity and transparency,

counting on the support and advice of the *Compliance and Internal Control Commission* for any doubt or need for clarification.

5.4 Facilitation payments

As a general rule, facilitation payments to public officials and authorities are **prohibited**. A facilitation payment is a small payment made to a public official or authority for the purpose of obtaining or expediting a routine or necessary administrative action.

6. CONFLICT OF INTEREST

In accordance with the **Code of Ethics**, "conflict of interest" shall be understood as a situation in which an individual, or a person related to him/her, has private interests that conflict, or may conflict, with professional interests.

In the event of a real, potential or apparent conflict of interest, the **Group Internal Audit & Control Department** must be informed immediately, in order to comply with instructions. Notwithstanding the above, if the circumstances of the case, and in view of the complexity of the situation, require a higher level of authorization, it will be submitted to the *Compliance and Internal Control Commission* (CICC) for approval.

7. RELATIONSHIP WITH THIRD PARTIES

Our relationships with third parties, including professionals from both the public and private sectors, must be based on the **principles of transparency, integrity, objectivity, impartiality and legality**, and in strict compliance with the values, principles and standards of conduct contained in the AREAS **Code of Ethics**.

In the event that there are indications that a third party is likely to generate a potential risk of violation of the principles contained in this Protocol, as well as of the applicable laws on anti-corruption, **AREAS shall refrain from contracting or doing business with the aforementioned party.**

8. ACCOUNTING RECORDS

Financial and operational transparency is a fundamental principle within the corporate strategy of AREAS. Therefore, all financial operations carried out must be **clearly and accurately** recorded in the accounting books and records, and false or misleading operational statements are absolutely forbidden.

GOVERNANCE OF THE PROTOCOL

9. CONTROL, CONSULTATION AND INTERPRETATION BODY

The **CICC** of AREAS is the internal body in charge of updating, supervising and controlling compliance with this Protocol.

Additionally, the Commission shall resolve any doubts or consultations that, if applicable, may arise from the application and interpretation of the rules contained in the Protocol.

10. REPORTING AND COMMUNICATION IRREGULARITIES

AREAS personnel are obliged to report, through communication mechanisms made available to them, all non-compliances or violations of which they have knowledge or suspicion.

For such purposes, AREAS has a corporate Whistleblower Channel (<https://areas.canaldenunciasanonimas.com>) applicable to all local Business Units.

In both cases, and in accordance with current regulations, all communications will be handled and managed under the highest standards of information protection and security, ensuring the protection of the guarantees inherent to each of the parties involved. In this regard, no conduct or behaviour that could be considered as a retaliation against good faith whistleblowers will be tolerated.

11. NON-COMPLIANCE WITH PROTOCOL

Failure to comply with the principles and values contained in the Protocol may result in the **application of the appropriate disciplinary measures**, all in accordance with the provisions of the AREAS disciplinary regime.

Compliance with the Protocol herein is the responsibility of each and every one of us. However, both the Administrators and the Directors of AREAS will be responsible for making known the contents of the Protocol, as well as for supervising its compliance in each of their respective areas of action.

12. PUBLICATION AND EFFECTIVE DATE

As a corporate protocol, this standard must be published in all countries where AREAS is present, and must be known and applied in all of them.

This Protocol shall enter into force after its approval.