



Regulatory Compliance Policy

Regulatory Compliance Program

Grupo ATEC

Project: Regulatory Compliance Policy

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Change Log

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1_ Aim

The Regulatory Compliance Policy (hereinafter "the Policy") develops what is established in the Satec Group's Code of Ethics and Code of Conduct and, consequently, links with its corporate values and is aligned with the culture of integrity and respect towards the rules of Grupo Satec and with its determination not to tolerate within it any conduct that may constitute a crime, and takes into consideration not only the interests of Grupo Satec but also the needs and expectations of its interest groups.

This policy includes as an essential concept that all members of the Satec Group, regardless of geographical or functional location, carry out their activities with the firm commitment to comply with current criminal legislation and regulations, as well as with ethical values and principles. contemplated in the internal regulations of Grupo Satec.

The purpose of the policy is not only to comply with the laws and external and internal regulations that may be applicable, but also to promote a culture of zero tolerance for regulatory non-compliance and corporate integrity in the day-to-day activity of all the people who They work for and for the Satec Group, establishing the principles and commitments of the Satec Group in terms of regulatory compliance, especially of its governing bodies and senior management, and extending to the management team, workers and collaborators of the Group. Satec a clear and transparent message of opposition to the commission of any illegal act, and the firm and decisive will to combat any illegal act and to prevent the commission of criminal conduct, as well as to act against it, defending the values, principles, image and reputation from Satec Group. To this end, it complements and develops what is established in the Code of Ethics and the Code of Conduct of Grupo Satec, as well as other policies related to corruption that already exist in Grupo Satec and, consequently, links with our corporate values, ratifying the will to Satec Group to maintain respectful behavior with both the rules and its ethical values, thus forming the reference framework of the Regulatory Compliance Model existing in Satec Group.

This document will be considered public and must be available on the corporate website.

2_ Area of application

This Policy binds and is applicable, and therefore must be known and understood, by all administrators, management personnel and in general, without exception and regardless of their position, responsibility, occupation or location, to all Group personnel. Satec and all companies and entities belonging to the Satec Group, including those companies or affiliated entities over which it has effective control or responsibility for their operation and/or management.

Additionally, Grupo Satec will promote and encourage among its contractor companies, suppliers, and collaborators the adoption of behavioral guidelines consistent with those defined in this Policy. Satec Group may request its counterparties to formalize their commitment to the conduct guidelines and Regulatory Compliance objectives established by this Policy.

Finally, people who act on behalf of Grupo Satec, without being part of its organization, will observe the provisions of the Policy and will strive to promote compliance in the companies to which they belong and from which they represent Grupo Satec.

3_ Commitments

The general objective of this policy is the maintenance and promotion of the culture of regulatory compliance existing in Grupo Satec, as well as the prevention, detection and management of those risks for which Grupo Satec could be responsible.

Respect for and compliance with applicable regulations constitutes the basis that supports the behavior of Grupo Satec in all its areas of action, and on this basis our main commitments regarding compliance are formed, which are:

- Guarantee the Satec Group's actions in accordance with its internal regulations and applicable legislation and prevent incorrect conduct or conduct contrary to the law, ethics, or internal policies and standards, which may be committed by members of the management team, people from the staff in the exercise of their functions, or third parties acting in the name and on behalf of the Group.
- Promote knowledge and respect for legality and internal regulations, generating a culture of compliance and zero tolerance for non-compliance with said Regulations, with the unequivocal support, commitment and leadership of the Satec Group's Administrative Body as well as through the team. directors and managers, who must be an example of leadership by never giving instructions contrary to the law or the rest of the internal regulations, and reacting quickly and unambiguously to non-compliance, taking, if necessary, disciplinary actions that are necessary. applicable based on current labor regulations.
- Communicate and raise awareness among the management team, workers and third parties of the obligation to provide information and report conduct that does not meet the standards of good practices and compliance of the Satec Group, enabling for this purpose an adequate communication channel that guarantees their independence, as well as such as confidentiality and absence of retaliation for the complainant and the rights of the people investigated.
- Ensure the existence and compliance of a disciplinary system that sanctions conduct contrary to applicable regulations, ensuring its equitable, proportional and fair application.
- Develop a regulatory compliance management system that allows you to identify, evaluate and manage the risks of non-compliance that may occur in the activities, operations, products and services of the Satec Group, as well as identify controls and integrate them into the organization's processes, through internal policies, management standards and action procedures.
- Provide training and advice to all staff on matters related to compliance, as well as, when appropriate, to third parties related to Satec Group.
- Periodically evaluate the design and performance of the regulatory compliance management system, implementing any changes and improvement opportunities that are identified.

4_ Regulatory Compliance Program Structure

The Satec Group Regulatory Compliance program has been developed based on the analysis of criminal risks that may affect the organization in the development of its activity, and is made up of a series of basic rules and organizational documents that were configured as the main axes of the Satec Group Regulatory Compliance Program and are intended to prevent, detect, manage and sanction the materialization of such criminal risks.

4.1. Basic rules

Starting from the Criminal Risk Assessment in which a detailed analysis is carried out of all those situations that, within the framework of the development of the Satec Group's activity, are likely to materialize into a criminal risk that results in the commission of a crime. illegal, the basic rules that make up the Program are:

- **The Regulatory Compliance Policy:** which aims to ensure ethical and responsible professional behavior of the entire workforce and the Group itself and, mainly, to avoid the commission of crimes and establishes the commitments that all Satec Group workers and management teams must assume, regardless of their location. geographical and position.
- **The Code of Conduct and the Code of Ethics:** that reflect the business culture of Grupo Satec and establish the ethical performance criteria that must be observed by all staff in the performance of their professional activities.
- **The Code of Conduct for Supplier Companies:** which defines the minimum standards of ethical and responsible behavior that must be observed by all supplier companies of the Satec Group.

4.2. Organizational documents

On the other hand, the organizational documents are the following:

- **Regulatory Compliance Program Manual:** is the document that defines the operation and structure of the Regulatory Compliance Program.
- **Ethical Channel Procedure:** through which any person on the Satec Group staff, or a third party with a direct relationship and legitimate commercial or professional interest, must inform the Regulatory Compliance Unit of any irregular or illegal conduct.
- **Disciplinary and sanctioning regime:** To ensure the effectiveness of the Regulatory Compliance Program, Satec Group has a disciplinary system that takes into account the sanctioning regime contemplated in the applicable Collective Agreements, through which violations or non-compliance with this document are regulated and applied. Policy, the Code of Conduct and the Satec Group Code of Ethics, the Penal Code and the current Legal System.
- The Regulations of the Regulatory Compliance Unit: which sets out its main functions.

4.3. Regulatory Compliance Unit

Satec Group has established the Regulatory Compliance Unit (hereinafter UCN). It is the body with autonomous powers of initiative and control that has the authority, resources and means necessary to implement and enforce the internal control measures that are appropriate to detect, prevent and avoid the commission of crimes attributable to the legal entity. , as well as for the appropriate reaction in the event that they have eventually occurred.

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The UCN has free access to all Satec Group documentation that may be useful. In this sense, the people responsible for any area are obliged to provide the UCN with any information requested about the area's activities related to the possible commission of a crime or incident that may be subject to monitoring and treatment by the UCN.

4.4. Ethical Channel

The Ethics Channel is enabled for all members of the Satec Group, as well as for any Stakeholder of the Satec Group that considers it necessary to use it to report any breach or suspected breach of the obligations determined in the Compliance Program. Normative.

Communications can be sent in writing through the form available on our website: <https://satecgroup.ethic-channel.com/newcom>, or by postal mail (attention: Compliance Unit, Avenida de Europa 34-A, 28023 Madrid).

The Satec Group Management Body guarantees confidentiality and absence of retaliation for any whistleblower who uses the Ethical Channel.

5_ Responsibility and supervision

All people who interact with the Satec Group must be familiar with the ethical and responsible principles, as well as with all the provisions and obligations contained in the different control measures (Code of Conduct, Code of Ethics, Policies and Protocols, etc.) adopted by the Satec Group, obligating itself to comply with them, as well as to preserve its integrity and reputation.

The Regulatory Compliance Unit is the body responsible for supervising the implementation and monitoring of the Regulatory Compliance Program, through the adoption of control, surveillance and communication measures that respond to the principles of speed, security and effectiveness. To carry out such function, it has the necessary authority and independence.

Likewise, and based on the information sent by the Regulatory Compliance Unit regarding the adequacy and implementation of the Regulatory Compliance Program, the Management Body must carry out, at planned intervals, a review of the Regulatory Compliance Program of the Satec Group.

6_ Duty to report non-compliance

Satec Group imposes the obligation on its members (management teams, workers, etc.) and, to the extent possible, on its Business Partners (supplier companies, collaborators, etc.) to facilitate through its daily conduct the effectiveness of the Regulatory Compliance Program, and to report on individual, collective behaviors or activities that occur in the context of their activities at Grupo Satec and that may constitute a contravention of the content of this document or the rest of the documents of the Regulatory Compliance Program. Regulatory Compliance, regardless of whether such behaviors have been ordered or requested by a superior, guaranteeing, in any case, that the reporting person will not suffer any retaliation for it and with full guarantee of confidentiality of the information and protection of their personal data. On the contrary, workers who, having knowledge of the commission of illegal or irregular conduct, do not report it, will be subject to sanctions.

In this sense, all people who are part of Grupo Satec must provide their full collaboration in the investigation of any fact for which they may be required and must maintain absolute confidentiality regarding any aspect of the process, as well as the facts brought to their knowledge.

The reporting person must provide all the evidence or indications available to them at the time of the report.

Whoever reports an irregularity that ultimately turns out not to be an irregularity or that could not be duly proven does not lack good faith. Anyone who knowingly communicates uncertain facts with the aim of harming other people or the Satec Group is considered to lack good faith.

Ill-intentioned communications will be reported and, where appropriate, sanctioned in accordance with current legislation.

Any irregular activity or activity contrary to this Policy or the principles contained in the Code of Conduct or the Code of Ethics and, in general, the current regulations, must be reported to the Satec Group through the form available on our website: <https://satecgroup.ethic-channel.com/newcom>, or by postal mail (attention: Compliance Unit, Avenida de Europa 34-A, 28023 Madrid).

7_ Consequences of non-compliance: Sanctioning regime

The performance of any conduct contrary to or that does not comply with the provisions of this Policy, as well as non-compliance with the Code of Conduct or the Code of Ethics of the Satec Group, will be considered a violation of contractual good faith, as well as negligence in work for the purposes determined in accordance with current legislation on labor discipline and/or contractual termination.

In this sense, Satec Group has a Disciplinary Regime regarding Regulatory Compliance, and may impose a disciplinary sanction in accordance with the current legal system that will be assessed based on the seriousness of the non-compliance committed and, where appropriate, the damages that said non-compliance could cause to Grupo Satec.

This disciplinary regime is, in any case, complementary to any judicial procedure that may be directed against the professional and/or worker and any sanction or consequence that may arise from said procedure.

It should be noted that this document does not replace the disciplinary regime currently in force at Grupo Satec, but rather contributes to the prevention and detection of regulatory risks.

The measures adopted from a labor perspective will be respectful of the applicable regulations, without losing forcefulness or proportionality with the seriousness of the facts of which they arise, informing the Legal Representation of Workers if appropriate.

If it is confirmed that the actions of any Member of the Satec Group could constitute a criminal offense attributable to the legal entity, such circumstance will be brought to light to the competent Authorities for their knowledge and prosecution. Such communication will be accompanied by the evidence and indications that may have been collected in this regard.

8_ Knowledge and communication of politics

This Policy is mandatory for all people associated with the Satec Group, as well as for business partners, requiring, therefore, not only compliance with criminal legislation, but also loyalty to the values and principles. ethical and responsible of the Satec Group.

To facilitate knowledge of the Policy, as well as its compliance, it will be made available to all members of the Satec Group through the Intranet and will be available to interested parties on the Satec Group website.

9_ Review, evaluation, control and improvement

The Regulatory Compliance Policy establishes a framework for the definition, control and evaluation of the objectives set by the Satec Group for the purposes of Regulatory Compliance. In this sense, Satec Group has established processes aimed at:

- Identify and determine the criminal risks to which the Satec Group is exposed through an analysis by functional area to implement those control measures that are necessary to prevent and minimize these risks.
- Assess, in terms of probability, the materialization of the identified and detected criminal risks, as well as the impact of these on Grupo Satec in the event of materialization.
- Satec Group assumes the commitment to continually review and improve this Policy and the content of the Regulatory Compliance Program when relevant changes occur in the organization, control structure or in the activity of the Satec Group, when legal or jurisprudential modifications take place. relevant or when relevant infractions of its provisions are revealed that so advise or, outside of these cases, an annual review of the content of the Program will be carried out.

10_ Approval and Validity

The Administrative Body of Grupo Satec, in the exercise of the functions assigned to it, and as a sign of its commitment to the regulatory compliance management system of the Satec Group and to the creation, promotion and continuous development of a culture of compliance in within the organization, proceeds to approve this Regulatory Compliance Policy, with the instruction that it be made available to the management team and staff of Grupo Satec as well as third parties that relate to Grupo Satec.

The Regulatory Compliance Policy has been approved by the Administrative Body of Grupo Satec on September 20, 2022.

11_ Entry into force

This policy and its modifications will be enforceable by all members of the Satec Group from the moment of its approval and corporate communication through the intranet and the corporate website: www.satec.es, from which time all members of the Satec Group have the obligation to observe and comply with it, and the right to demand it.