

# CRIMINAL COMPLIANCE POLICY



At AMPO we are 100% committed to excellence in every area, including matters regarding our ethical and legal responsibility. With this declaration, we would like to explicitly and categorically express our zero tolerance, prohibition and opposition to any criminal act being committed, spreading and incorporating this culture of compliance to our business purposes and to all our activities, both in Spain and in other countries where AMPO is present.

Every person belonging to AMPO, its managers, partners and other staff, whether permanent or temporary, are under obligation to comply with the requirements of this Policy and the Criminal Compliance System that we have launched to manage its fulfilment, including the Code of Conduct and Ethics and the existing preventive procedures and controls.

This Policy also applies to third parties with whom we have a relationship, so they will be duly informed of said Policy and they will be required to adopt and comply with its measures in the development of their relationship with our organisation. Furthermore, we make it available to any interested party in the existing public communication channels ([www.ampo.com](http://www.ampo.com)).

The organisation has launched a criminal compliance system in which our potential risks have been identified and evaluated, unfolding a set of mitigation and control measures that must be duly revised and monitored. A criminal compliance body has also been set up, which is equipped with the necessary resources and is entrusted with designing, implementing, managing and verifying the system's efficacy. This body has maximum independence, capacity and authority to correctly carry out its duties, monitoring and controlling the system as required to be able to guarantee its efficacy in achieving our objectives and our continuous improvement.

Everyone included in the scope of this policy is under obligation not only to comply with it but also to report any event or behaviour that they detect and suspect may be a breach or a criminal risk. For this purpose, there is a reports channel through which people can send any possible breaches as well as queries about any matter related to this subject. Users of this channel will be treated with the utmost confidentiality, and they cannot suffer any reprisals for acting in good faith. All the issues received will be channelled and managed according to the established internal procedure.

Failure to comply with the requirements laid down in the policy and the criminal compliance system, particularly our Code of Conduct and Ethics, may have internal and/or external consequences, and these shall be proportional to the severity of the events, equal for all recipients and respectful of the applicable regulations.

In witness whereof, signs this document in Idiazábal on 13 May 2021

A handwritten signature in black ink, appearing to read 'Aritz Irastorza', enclosed within a hand-drawn oval scribble.

Aritz Irastorza  
*President*