

CRIMINAL COMPLIANCE AND ANTI-BRIBERY POLICY

The Ensa Group makes a firm commitment to ethics, integrity, professionalism and good governance. These principles are set out in our System for Good Corporate Governance.

To reinforce this commitment, Ensa has adhered to the United Nations Global Compact, which implies operating within the framework of the 10 universally accepted principles on Human Rights, Labour Rights, the Environment and the Fight against Corruption. Ensa has integrated these principles as basic values in the performance of its activities.

The Company's Board of Directors, as the highest decision-making and representative body of the Company, approves this Criminal Compliance and Anti-Bribery Policy to express its permanent commitment to comply with applicable regulations, the principle of zero tolerance of any illegal action, the explicit prohibition of criminal offences, and the fight against fraud and corruption in all fields of its activity.

1. PURPOSE

The purpose of this Policy is to convey to all managers, executives and employees of the Company, as well as any related third parties, an emphatic message that the Company opposes all forms of corruption and fraud, and that it is Ensa's firm intention to stamp it out in all its activities, thereby contributing to meeting the Sixteenth Goal of the Sustainable Development Goals approved by the United Nations.

To implement this policy, the company has implemented a System for Good Corporate Governance consisting of all the standards, official procedures, plans, protocols and other relevant actions aimed at guaranteeing that the company complies with applicable laws and with its Code of Conduct as a basic standard for operation.

2. SCOPE

The Criminal Compliance and Anti-Bribery Policy applies to all managers, executives and employees of Equipos Nucleares S.A., S.M.E. (Ensa), and to its current or future subsidiaries or partner companies, and to the stakeholders with which the Company has a relationship.

Any third parties with which the Company has a relationship must carry out their activities with integrity and professional ethics and must actively struggle against fraud and corruption. For this purpose, they must emphatically reject any type of corruption, especially bribery, and refrain from promoting, facilitating, participating in or concealing any type of money-laundering or illegal transactions.

3. GOVERNING PRINCIPLES

The following principles govern the Policy:

- A.** Ensa does not tolerate, permit or participate in any type of corruption, extortion or bribery in its business operations, neither in the public sector nor in the private sector.
- B.** Ensa promotes a culture of prevention based on the “zero tolerance” principle toward corruption in business operations and toward any other illegal activities and fraud. This principle applies absolutely and prevails over the possibility of obtaining any type of economic benefit for the company or for its professionals.
- C.** Ensa complies with all current regulations and operates in accordance with the System of Good Corporate Governance at all times, while also complying with the company’s internal rules, with the Criminal Compliance and Anti-Bribery Policy and with the Criminal Compliance and Anti-Bribery Management System.
- D.** Ensa ensures that Corporate Compliance has the material and human resources needed to provide vigilance of operations and compliance with this Policy in an effective, proactive and autonomous manner.
- E.** The relationship between the professionals of Ensa and any public administrations, authorities, public servants and other persons who participate in performing public duties, political parties and similar organizations, is always governed by the principles of cooperation, transparency and honesty. Ensa has implemented a Protocol on Gifts and Hospitality to prevent any action that might be considered an act of corruption or bribery.
- F.** The professionals of Ensa take part in adequate training programs, by any means that might be appropriate, with sufficient regularity to guarantee that they are up to date on this subject. In particular, they receive training on the Code of Business Conduct to prevent any specific case of fraud, corruption or bribery.
- G.** Ensa fosters an atmosphere of transparency by maintaining the appropriate internal channels to promote the reporting of potential breaches. This includes the ethics channel, canaletico@ensa.es, which permits Ensa’s professionals and related third parties to report conduct that might fail to comply with the System of Good Corporate Governance or conduct that might be considered illegal or contrary to the principles of the Code of Business Conduct.

H. Ensa commits not to carry out any type of retaliation, whether direct or indirect, against individuals who use the different reporting channels to report any potential breaches or any act that might be considered illegal or contrary to the System of Good Corporate Governance.

I. The risks associated with fraud, corruption and bribery are taken into account adequately in all of Ensa's internal procedures and, in particular, in all processes that entail a relationship with third parties.

J. Ensa's relationship with its suppliers is based on integrity, professional ethics and an active fight against fraud and corruption. The suppliers must comply with Ensa's policies, rules and procedures on the prevention of corruption, bribery and extortion. Within the context of the business activity carried out on behalf of or in the name of Ensa, no supplier may offer or bestow on public servants, on third parties or on any Ensa employee, either directly or indirectly, gifts, presents or other unauthorized advantages, whether in cash or otherwise, in order to secure favourable treatment in the award or maintenance of contracts or to obtain benefits for themselves or for the supplying company.

K. Pursuant to current regulations and in accordance with its collective bargaining agreement, Ensa imposes disciplinary penalties on any conducts that contribute to prevent or hinder the detection of crimes and that fail to comply with the obligation to report any potential breaches to the monitoring bodies. To this end, all professionals of the company are hereby notified of their obligation to use the relevant channels to report any potential criminal offence or breach of which they are aware.

L. Ensa has implemented indicators to measure the performance of the Criminal Compliance and Anti-Bribery Management System to monitor that all of its components work correctly, and also promotes the continuous revision and improvement of the System.

4. MONITORING, EVALUATION AND REVIEW

A. Monitoring

Without prejudice to the responsibilities of other bodies, directorates, divisions or departments of the company, it is the responsibility of the Compliance Committee to monitor the implementation and development of and compliance with the Criminal Compliance and Anti-Bribery Policy.

For this purpose, the Compliance Committee has initiative and supervision powers to monitor the performance and effectiveness of this Policy, and to ensure the adequacy of the protocols and procedures for the prevention of offences in light of the company's needs and circumstances.



B. Evaluation

The Compliance Committee will review the performance and effectiveness of this Policy at least once a year. The need to modify this Policy will also be analyzed when relevant breaches of the System come to light and when changes occur in the activities, organisation or control structure of the company.

C. Review

The Compliance Committee will periodically review the content of this Policy at least once a year to ensure that it includes the international recommendations and best practices in force at all times. The Compliance Committee will propose to the Board of Directors any modifications and updates that might contribute to its continuing development and improvement.

5. AWARENESS AND COMPLIANCE STATEMENT

This Policy is made available to the entire company via the Intranet. Ensa will also make this Policy available to business partners and stakeholders on the company website at: www.ensa.es.

Ensa employees in positions especially exposed to criminal risks will be requested to provide a compliance statement every year. Likewise, all business partners who are subject to a criminal risk classified as higher than minor will be requested to comply with the principles of this Policy.

(Approved by the Board of Directors on April 29, 2021)