

AFP COURTS	MANAGEMENT POLICY		Page: 1	Issued by : J. Tostado
	ANTI-CORRUPTION POLICY	Rev. 00	Date: 12 May 2024	Ratified by: J. Caña

ANTI-CORRUPTION POLICY

STATEMENT OF INTENT

We are fully committed to complying with regulations related to the prevention and fight against corruption and fraud in all its forms.

PRINCIPLES

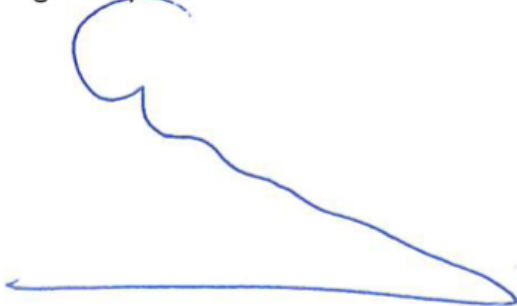
We reject all forms of corruption and fraud, both public and private, and adopt a zero-tolerance policy towards any violation of this policy. Therefore, we commit to:

- Not seeking to influence the will or objectivity of public authorities, officials, or external parties to the company in order to obtain benefits or advantages through unethical or illegal practices.
- Not giving, promising, or offering, directly or indirectly, anything of value to public authorities, officials, or any individual or legal entity with the intent to gain undue advantages for the company.
- Not authorizing any facilitation payments.
- Not improperly soliciting or receiving, directly or indirectly, commissions, payments, or benefits from third parties in relation to hiring operations, investments, divestments, financing, or general business expenses carried out by the company.
- Recording all company interventions, operations, and transactions in its books and records in good faith and with accuracy.
- Implementing specific controls and procedures to prevent, detect, and address any behavior that may indicate corruption, fraud, or a conflict of interest.

Any employee who becomes aware of, has doubts about, or reasonably suspects a case of corruption, fraud, or a violation of this policy must report it immediately to their supervisor or the Human Resources manager. Reports will be handled in accordance with applicable laws and best practices.

Employees or business partners who violate these provisions will be subject to appropriate disciplinary measures, including, where applicable, termination of their contract or employment, as well as other potential legal actions or sanctions.

Signed by:



General Management

AFP COURTS, SL