




**SAVERA  
Group**

# **COMPLIANCE POLICY**

<b>Prepared by:</b>	<b>Reviewed by:</b>	<b>Approved by:</b>
	FINANCIAL MANAGEMENT GENERAL MANAGEMENT	Administrative Body of SAVERA
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# Compliance Policy

For the purposes of this policy, the "SAVERA Group" is composed of the following entities of Spanish nationality:

- SOCIEDAD ANÓNIMA DE VERA, S.A.
- PERFILES ESPECIALES SELAK, S.L.
- SAVERA SERVICES OF ELEVATION, S.A.
- ESTAMPACIONES METÁLICAS ÉPILA, S.A.

SAVERA Group has its own compliance policy, which outlines how our companies have always operated, grounded in a culture of ethical behavior and based on shared values and principles. This approach actively prevents and avoids inappropriate behavior.

The policy highlights that all members of SAVERA Group, regardless of their geographical or functional location, carry out their activities with a firm commitment to complying with the applicable legislation and regulations, as well as the ethical values and principles outlined in our internal regulations.

Thus, the compliance policy of SAVERA Group (hereinafter, the "Policy") complements the Group's Code of Ethics and other existing policies, forming the reference framework for the existing Compliance Program within SAVERA Group.

## Scope of application

The Policy applies to and binds the administrative body, management staff, and, without exception and regardless of their position, responsibility, occupation, or location, all personnel of all the commercial companies or entities that are part of SAVERA Group (hereinafter, the "Obligated Individual"), as defined by the applicable regulations.

Additionally, individuals who act on behalf of any of the companies or entities within SAVERA Group, without being part of its organization, must observe the provisions of the Policy and strive to promote its compliance within the companies or entities to which they belong and from which they represent the Group.

## General principles of action

Without being exhaustive in its explanation, the following are the general principles of action of the Compliance Program:



- **Compliance with legality and internal regulations:** Respect for the law and zero tolerance for illegal actions are fundamental principles of SAVERA Group.
- **Respect for the image and reputation of SAVERA Group:** The Obligated Individual must exercise the utmost care and due diligence to preserve the image and reputation of SAVERA Group in all their professional activities.
- **Establishing adequate policies and procedures:** SAVERA Group has policies, procedures, and processes tailored to its activities and structure to reasonably prevent various criminal risks associated with its operations.
- **Human and financial resources:** SAVERA Group ensures that the risk prevention body (the Ethics Committee) has sufficient resources to effectively fulfill its duties of supervision, monitoring, and control.
- **Obligation to report potential illegal conduct:** SAVERA Group provides a communication channel for reporting and consulting on ethics, corruption, and criminal risks.
- **Independence and transparency in relations with third parties:** Independence and transparency are non-negotiable principles for SAVERA Group. Therefore, all Obligated Individuals must always act impartially, maintaining independent judgment free from external pressure or personal interests.

## Foundations of the Compliance Program

The Compliance Program of SAVERA Group is a compilation of the policies, procedures, and controls in place across all the companies and entities that make up the group, aimed at preventing, detecting, and responding to ethical and compliance risks.

In summary, the Compliance Program includes the following key structural elements:

- Compliance manual or crime prevention protocol
- Assessment and identification of criminal risks
- Monitoring and supervision system
- Internal system for reporting misconduct (the "Ethics Channel")
- Disciplinary system
- Control and supervision body of the Compliance Program (the "Ethics Committee")
- Code of Ethics and corporate policies
- Training on compliance and prevention of ethical and compliance Risks

These elements are mandatory knowledge for all Obligated Individuals.

## Reporting of Irregularities

Obligated Individuals are required to report, through the established communication channels, any breaches or violations related to the Policy and other applicable internal regulations that they are aware of or suspect. In line with SAVERA Group's commitment to creating a work environment free from retaliation in reporting situations, the internal Policy on Prohibition of Retaliation in force at SAVERA Group will apply.

## Policy breaches and commitment to compliance

The responsibility for complying with the provisions of this Policy rests with the administrators, management staff, and employees of each of the companies and entities that form part of SAVERA Group. In any case, both the administrators and management of these entities are responsible for disseminating the content of the Policy and supervising its compliance within their respective areas of responsibility.

This Policy reinforces SAVERA Group's commitment to upholding legality, as well as to communicating and promoting the principles contained in its Compliance Program. SAVERA Group commits to adopting the principles and values enshrined in this Policy and other internal regulations within the group.

Revision history		
No.	Date	Reason
1	May 2024	Issuance of version 1 (approved)
2		