ANTI-CORRUPTION AND BRIBERY POLICY

AUDAX RENOVABLES, S.A.

AND ITS GROUP OF COMPANIES

Version control			
Version	**Date**	**Controller**	**Action**
1.0	23 January 2024	Criminal Compliance Committee (author)	Design and preliminary approval of the Anti-Corruption and Bribery Policy, in accordance with Organic Law 10/1995, of 23 November, the Penal Code, and other international laws, which regulate the subject.
2.0	09 January 2025	Group Compliance Officer	This Policy is updated in order to take into account the new AUDAX Group Corporate Compliance Function (Group Compliance Officer replacing the former Criminal Compliance Committee), as well as to introduce other aspects of improvement related to the organisation of its content.

Approvals		
Date	**Controller**	**Action**
23 January 2024	Criminal Compliance Committee	Approval of the Anti-Corruption and Bribery Policy
15 February 2024	Audit Committee	Review for the validation and approval of the Anti-Corruption and Bribery Policy by the Board of Directors

27 February 2024	Board of Directors	Approval of the Anti-Corruption and Bribery Policy (version 1.0)
21 January 2025	Audit Committee	Review of Policy update for elevation and approval of the Anti-Corruption and Bribery Policy by the Board (version 2.0)
25 February 2025	Board of Directors	Approval of the update of the Anti-Corruption and Bribery Policy including the new Group Compliance Officer and the introduction of new areas of improvement (version 2.0).

Related regulations	
Name	**Last version**
Compliance and Criminal Risk Prevention Policy	17 December 2024
Corporate Code of Ethics and Conduct	10 November 2020
Compliance and Criminal Risk Prevention Handbook	17 December 2024
Corporate Policy on Internal Information System and Informant Protection	17 December 2024
Internal System of Information and Management of the Whistleblowing Channel Procedure	17 December 2024
Gifts and Hospitality Policy	25 February 2025

INDEX

1. OBJECT 6
2. SCOPE OF APPLICATION 7
3. DEFINITIONS 7
4. PROHIBITED CONDUCT 9
5. GIFTS AND HOSPITALITY 11
6. RISK SITUATIONS OR RED FLAGS 12
7. GOVERNANCE 13
8. INTERNAL REPORTING SYSTEM - WHISTLEBLOWING CHANNEL 14
9. DISSEMINATION AND TRAINING 14
10. REPORTING OF BREACHES 15
11. DISCIPLINARY MEASURES 15
12. REVIEW AND PUBLICATION OF THE POLICY 15
ANNEX 17

LETTER FROM THE CEO

This Anti-Corruption Policy responds to AUDAX's commitment to act in accordance with the corporate mission and values that regulate our business activity. From the Group we assume principles, rules, and values based on ethics and integrity, which are part of our strategy and are included in our Code of Ethics and Corporate Conduct and other internal regulations of the Model of Compliance and Prevention of Criminal Risks.

This Policy reflects our respect for the most absolute legality and corporate integrity, also in line with national and international anti-corruption guidelines. In this spirit, we reiterate our message to always, and without exception, prioritise in our activity the principle of zero tolerance to any action that undermines the values of AUDAX, including especially conduct that can be understood as corruption.

Through this Policy we define the guidelines of behaviour that must govern the activity of the people who form part of AUDAX and that of the third parties with whom we interact. We are committed to the prevention of corruption and, consequently, AUDAX Management encourages you to read this Policy carefully and to report any irregularity you may detect.

We count on your full commitment to the application and promotion of the basic principles of behaviour contained herein in order to contribute to the sustainable success of AUDAX.

General Manager of Audax Renovables, S.A.
Mr. Óscar Santos Juvé

1. OBJECT

The object of this anti-corruption and bribery policy (hereinafter, the "Policy") is to address the necessary compliance with the legal requirements concerning anti-corruption principles, management of the risk derived from any kind of corrupt business practice or any operation contrary to the good practice, in any of its forms, and to implement, among others, principle no. 10 of the UN Global Compact, established as one of the values within Audax Renovables, S.A. (hereinafter, either "Audax" or the "Company") or its current or future subsidiaries, with Directors, Significant Shareholders or with other Related Persons (according to the definitions of these terms featured in the following paragraph). It is a fundamental rule within the Company, which demonstrates the commitment of Audax to act in line with the most demanding ethical principles, transferring the importance of business integrity to all the directors, managers and employees of the Company. These principles of conduct inspire the Company to undertake a public commitment to responsible management, which goes beyond mere legal compliance, as well as to promote and ensure respect for the values contained in these principles among its directors, managers, employees and business partners and/or suppliers. The Policy broadens and reinforces the stipulations of the Corporate Code of Ethics and Conduct, the Criminal Compliance Policy and, in general, the Audax Criminal Risk Prevention and Compliance Model, in order to frame it within the Company's criminal compliance management system.

In line with the main international references concerning the responsibility of businesses and anti-corruption, and in accordance with the aforementioned principles of conduct, it is paramount for the Company to ensure that certain behaviours, which could harm its business integrity, are not allowed, such as, for example, offering or accepting gifts, invitations or other kind of incentives that could reward or influence a business decision, or the fact of incurring possible conflict of interest, which could give preference to personal instead of collective priorities; thus ensuring that all the persons involved in the activities of Audax act with rectitude and do not in any case intend to gain illegitimate profit for the Company, for themselves or for third parties through the misuse of their position or their contacts.

This Policy establishes rules of conduct with regard to accepting or offering gifts or invitations, thus prohibiting any kind of bribery, all of which in compliance with the Gifts and Hospitality Policy already initially approved by the Board of Directors of the Company on 27 September 2023. It is not permissible to promise, offer or give any profit or advantage of any kind, directly or indirectly (through a third party) in order to influence the decisions of any kind (including governmental, administrative or judicial), or obtain undue advantages for the Company. It is also prohibited to accept any profit or advantage that could result from any non-compliance with obligations and duties of the directors, managers and employees of the Company.

The Policy has been reviewed and approved by the Group Compliance Officer (the "GCO") as well as by the Audit Committee and later referred to the Board of Directors for its final review and approval and is applicable to all the Group.

2. SCOPE OF APPLICATION

The Policy will be applicable to all the Audax Group (insofar as it affects the subsidiary companies, as defined below).

This Policy represents the minimum standard and shall be complied with by all the directors, managers and employees of the Company, in any of the territories where the Company is present, as well as by those third parties who negotiate or participate in business on behalf of Audax.

The Company is responsible for developing and establishing the necessary instruments and mechanisms in order to provide adequate and efficient coordination between Audax and the other companies belonging to the Audax Group (according to the definition featured below), all of which without prejudice or any harm to the capacity of each of these companies to make autonomous decisions, in accordance with the interest of each of these companies and the fiduciary duties of the members of their administrative bodies towards all the shareholders or directors.

To this end, the governing bodies of all Group companies must ratify and adhere to this Policy, ensuring its integration into their respective organisations and its compliance by all their professionals, as well as the implementation of any adaptations that may be necessary in accordance with applicable local legislation.

As a general rule, in the event of any discrepancy between this Policy and the local rules of the country where the subsidiary is located, the stricter rule shall apply. However, in the event of a conflict between this Policy and the local rule, the Group Compliance Officer or Compliance Officer of the Audax Group subsidiary should be consulted beforehand.

3. DEFINITIONS

a) **Public corruption:** to offer money, services or other valuable items to the authority or Public Official, who accepts or requests them in exchange of providing a gain or advantage within the scope of duties of the Public Employee or Official in the Public Administration.

b) **Corruption in Business**: in addition to the acts classified as criminal in articles 286 bis 286 ter of Organic Law 10/1995, of 23 November, Penal Code, the following shall be also understood as "Corruption in Business": all the unlawful conduct in the form of payment or acceptance of money, bribery and other pecuniary offer with the sole purpose of ensuring the execution of a contract or to obtain competitive advantage over other companies, or in the form of request, acceptance or reception of such offers.

c) **Public Employee / Official:** refers to: (i) any public employee or elected official, agent, employee (regardless of their rank) or person who acts on behalf of the state, regional or local government, department, agency, body, company owned or controlled by the state, international public organisation, political party or entity

which is supported mostly with public funds, which is generally perceived as an entity fulfilling governmental duties, or whose key executives or directors are appointed by a government; and (ii) any political party, political candidate for office, or any person acting on behalf of a political party or a political candidate for office. By way of example, these include: issuers of government permits, approvals or licences (whether international or national, regional, municipal etc.), airport authorities, employees and managers of state-owned companies, customs agencies, immigration or tax agents, ministers or representatives of national or foreign governments.

d) **Extortion**: Extortion means any act involving violence or intimidation in order to obtain any kind of gain.

e) **Audax Group**: Audax Group means the group of companies whose parent company, as per definition of article 42 of the Code of Commerce, is Audax Renovables, S.A.

f) **Related Person**: a "Related Person" of the Official means: (i) their spouse or spousal equivalent; (ii) ascendants, descendants and siblings of the Official or of the spouse of the Official; (iii) the spouses of the ascendants, descendants and siblings of the Official, and (iv) the companies or entities in which the Official owns directly or indirectly, including through an intermediary, a shareholding granting them significant influence, or where they hold a position in the administrative body or senior management of such company or of its parent company. For these purposes, significant influence should be understood as holding a stake of 10% or more of the share capital or of the voting rights, or a stake which gives the right to obtain in law or in fact a representation in the administrative body of the company.

g) **Valuable Item:** any item of tangible or intangible value, broadly defined, in any form, including, but not limited to: cash, cash equivalent (such as gift cards and product discounts), loans, gifts, invitations, goods, services, job positions for relatives, travels, accommodation, entertainment, meals, cost reimbursement, favours, business or employment opportunities, fulfilment of a request to give something of value from a third person, contributions to charitable purposes or other non-profit organisations and promotional sponsorship.

h) **Bribery**: providing any payment, gift or favour, directly or through an intermediary, to the authority or Official, or to a particular person or entity, in order to obtain any profit for the Company or any of its members.

i) **Business Partner**: a third person acting on behalf of the Company or of any entity owned or controlled by the Company, which may interact with external agents, especially when those external agents are Public Officials; or any alliance in which the Company has economic interest, in which the following intervene: agents, brokers, intermediaries, advisors, consultants, representatives, joint-venture partners, co-investors, franchisees, travel agencies, authorised shipping agents or custom agents, lawyers or lobbyists acting on behalf of the Company.

4. PROHIBITED CONDUCT

Any breach of the law (see Annex I) and other applicable internal anti-corruption regulations and any failure to comply with the law (see Annex I) and other applicable internal anti-corruption regulations constitutes a breach of this Policy:

a) Delivery of illicit gifts

It is prohibited to give, offer, promise, order or authorise the presentation of a Valuable Item, directly or indirectly, (a) to an Official, in order to unlawfully influence one of their official actions or decisions; (b) to a legal person or similar entity in which the Public Official or a Related Person is a shareholder, administrator, participant or has managerial control or a position of influence, in order to unlawfully influence one of the official actions or decisions of the Public Official; (c) to any person, in order to induce them to unlawfully influence an official action or decision; (d) as a reward for an official action or decision. Among the actions, omission is also included, as well as a delay of action which the Public Official should undertake. In order for a breach this policy to occur it is not necessary for the exchange to actually take place: an offer or a promise should be enough.

It is also prohibited to request, receive or accept a Valuable Item, which may induce to perform official duties in a dishonest or improper way, or to offer, present or authorise the presentation of a Valuable Item in order to influence other person to perform their official duties in a dishonest or improper way.

b) Accuracy of records

It is prohibited to sign fake contracts or not to fail to keep exact books and registers, hide or misappropriate funds or hide or try to hide the sources of those funds.

c) Relations with political parties

Donations to political parties and their related foundations are absolutely prohibited.

Agreements with political parties are allowed only in situations which are admissible under applicable Spanish legislation.

d) Facilitation payments

Facilitation payments, intended to accelerate or facilitate any kind of process or to grant a favourable position to the Company over the competition are absolutely prohibited, even in the case when they are not intended to secure undue advantage.

e) Influence peddling

The members of Audax are likewise forbidden from carrying out any activity, which may constitute an influence peddling offence involving a Public Official or Authority, taking advantage of any personal, family or affinity relationship in order to secure a favourable decision, directly or indirectly, for a company or a member of Audax.

f) Sponsorship and contributions to foundations and NGO's

- Sponsorship consists in Audax granting aid to the sponsored organisations in order to promote sport, medical, charitable, or other activities in exchange of the promotion and publicity of the Audax trademark. However, it is also possible to grant completely altruistic donations to non-profit organisations in order to promote an activity which Audax, according to its Board of Directors, has close affinity because of their objectives, scope of activities, social impact or consonance with the action lines of Corporate Social Responsibility of Audax.

- The sponsorship agreements shall be reviewed periodically in order to verify whether the economic aid is used to achieve the agreed objectives.

- The donations to the Foundations and/or NGO's shall consist of economic or other aid, always of charitable nature and without the intention to obtain any favour or advantage in exchange.

g) Extortion and Bribery

- Due to the gravity of these instances of conduct and the paramount consequences which they may bring about, both for the individual involved and for Audax, it is absolutely prohibited to carry out Extortion, Public Corruption, Business Corruption or Bribery, as well as to undertake any attempt of it while performing business activities of Audax.

- Audax is required to have in place: (i) adequate internal controls and procedures to help prevent bribery or any other form of corruption and to detect illegal transactions and (ii) accounting practices that help ensure the accuracy of its books and records. The maintenance of hidden or improperly accounted for assets and liabilities is prohibited. All payments, expenses and transactions must be properly accounted for in accordance with applicable accounting standards, without any hidden disbursements that disguise the true nature of any arrangement, and must be properly authorised, as set out in the payment, expense and transaction procedures.

- In view of the above, the Audax Group reaffirms its zero tolerance for any kind of corrupt practice or practice contrary to good business faith.

h) Conflicts of interest

At AUDAX we maintain honest and transparent relationships, avoiding any conflict of financial, family, political, etc. interests.) Thus, we must all act at all times with integrity and professionalism, avoiding prioritising personal or commercial interests that violate the law or our internal regulations, including this Policy:

- Decisions must be taken impartially, objectively, in the best interests of AUDAX and in accordance with applicable law and the Group's internal rules.
- Any situation of personal and/or Related Persons' conflict of interest that may conflict with the interests of AUDAX must be avoided.

- Any AUDAX professional who finds himself/herself in a situation of conflict of interest must notify the GCO or, if applicable, the Compliance Officer of the subsidiary if the situation occurs at local level, in order to ensure an appropriate management of the situation.
- AUDAX does not permit the use of Group assets and information for personal or improper gain.
- At AUDAX, the selection and recruitment of individuals and third parties must be conducted in accordance with the principles described in this Policy and applicable Group internal procedures.
- AUDAX conducts due diligence on suppliers and other partners with whom the Group has relationships to ensure that they comply with anti-corruption regulations, are reputable and aligned with principles and values equivalent to those set out in the AUDAX Code of Ethics.

i) Money laundering and/or terrorist financing

Any conduct that may contribute, directly or indirectly, to money laundering or terrorist financing is prohibited at AUDAX. In particular, it is prohibited to acquire, possess, use, convert or transfer assets, knowing that they originate from a criminal activity, or to conduct any act to conceal their illicit origin.

5. GIFTS AND HOSPITALITY

In general terms, Audax understands that customary gifts in business relationships or any other legitimate form of expense or hospitality are an important part of our relationships with our customers and suppliers. However, it is important to determine what kind of gifts and hospitality we may give to our customers and suppliers in order to prevent them from concealing bribery or alleged corruption. Furthermore, not only the contents of this Policy should be considered, but also the Group's Gifts and Hospitality Policy will apply.

This Policy permits expenditures that may be considered normal or appropriate in a bona fide business and professional relationship, provided that they meet the following criteria:

a) They are made (i) on behalf of Audax and, (ii) on a public and not secret basis.
b) They do not involve cash or cash equivalents.
c) They do not include the financing of entertainment costs, travel and similar expenses of accompanying persons or guests at business meetings.
d) Do not include gifts which are not in good taste, or which involve attendance at places inappropriate for the conduct of business relationships.
e) Are made at an appropriate time, i.e. at times when no relevant decisions are being made regarding matters that may have an impact on Audax's relationship with a third party.
f) They are not intended to influence the person for whom they are intended.

The granting or receipt of gifts beyond those that fall within the scope of social customs and do not exceed the economic values expressly established by the company shall not be permitted.

In any event, the provisions of the Corporate Code of Ethics and Conduct and the specific regulations governing the Group's position on the receipt and granting of gifts and, in particular, the Group's Gifts and Hospitality Policy shall apply.

The giver or provider of the gift or hospitality must consider whether it may compromise the recipient's independence, integrity, and/or honesty in making a business or corporate decision and, in all cases, comply with the Gift and Hospitality Policy in force. In case of doubt, the line manager and the Group Compliance Officer / Compliance Officer of the AUDAX Group company in question should be consulted.

6. RISK SITUATIONS OR RED FLAGS

Within the organisation's internal scope of action:

- Unexplained or insufficiently justified travel and/or representation expenses.
- Family or personal relationships with authorities or public officials likely to be linked to AUDAX's business activities.
- Information obtained in the framework of internal due diligence procedures, as part of recruitment or hiring processes, on criminal background and especially on suspected serious business offences or infringements related to possible corrupt practices.

When entering into or renewing a business relationship:

- Refusal to adhere to AUDAX's internal anti-corruption regulations or, alternatively, to provide their own internal regulations by the companies AUDAX deals with.
- Resistance or refusal to include AUDAX's Compliance and anti-corruption clauses (or a large part of their content).
- Information obtained in the framework of external due diligence procedures on criminal backgrounds and especially on suspected serious business crimes or offences related to possible corruption practices.

During the commercial relationship:

- Issuing invoices with diffuse, indeterminate concepts or that include services or goods other than those actually provided or received.
- Requesting or offering payments in cash or in kind.
- Requesting or offering payments through an intermediary without professional justification or for amounts not included in the budget or invoice.
- Soliciting or recommending public officials or politicians for the hiring of certain persons or services.
- Solicitation of unusual or high commissions.
- Soliciting or offering unusually favourable payment terms, or unjustified and disproportionate price increases or discounts on goods or services.
- Requesting payments to be made to third parties located in non-cooperative countries and territories for tax and anti-money laundering purposes, depending on the applicable regulations.

7. GOVERNANCE

In order to ensure the implementation and compliance with this Policy, AUDAX has a governance model that assigns roles and responsibilities to the following bodies that collaborate in promoting compliance with the provisions of the Policy:

a) Board of Directors and its Delegated Committees.

- Approve the adoption of the Compliance and Criminal Risk Prevention Model, which integrates specific surveillance and control measures for the prevention of corruption and approve the different versions of the Anti-Corruption Policy.
- Ensure that the corporate strategy is aligned with the principles of the Anti-Corruption Policy.
- Keep adequately informed of the operation of the Anti-Corruption Management System and compliance with the Policy.
- Ensure adequate resources to enable the effective exercise of the functions derived from the Anti-Corruption Management System and to enable effective compliance with the Policy.

b) Management

- Promote a culture of ethics and compliance in their work teams, encouraging knowledge of the Anti-Corruption Policy and compliance with it.
- Ensure the integration of the obligations of the Policy in corporate activities and processes.
- Support the Group Compliance Officer in the correct implementation of the Policy, as well as in the identification of possible corruption risks and the implementation of measures and controls to prevent such risks.
- Use the Internal Reporting System - Whistleblowing Channel to report possible breaches of legal or voluntary regulations applicable to AUDAX, including breaches of this Policy. Likewise, Senior Management shall encourage the use of the aforementioned Channel, ensuring that no reprisals of any kind are taken against whistleblowers who in good faith claim to use it.
- Encourage the participation of the teams in the training and communication actions of the Anti-Corruption Management System and this Policy that are conducted.
- Review the effectiveness of the measures implemented within the framework of the Anti-Corruption Policy and inform the Group Compliance Officer of opportunities for improvement.

c) Group Compliance Officer

- To design this Policy and ensure compliance with it by the Group's personnel.
- Promote the dissemination of the contents of the Policy through the development of training, communication and awareness-raising actions aimed at all personnel.
- Prevent, detect, and manage risks related to corruption.
- Implement and monitor controls to prevent and mitigate the risks of corruption in the organisation, with the collaboration of the other people and areas involved.
- Provide advice to staff on the interpretation of this Policy, responding to any queries that may arise in this area.
- Encourage the use of the AUDAX Internal Reporting System - Whistleblowing Channel to report potential breaches of legislation and this Policy.
- Supervise, update, and ensure the continuous improvement of the Policy.
- Keep the Board of Directors, Audit and Control Committee and Senior Management informed about Compliance and anti-corruption performance.

- Ensure that no person is subject to retaliation or discrimination when reporting in good faith potential deviations or breaches of the provisions of this Policy.
- Coordinate with the Compliance Officers appointed in the different AUDAX Group companies, in order to ensure compliance and integration of the Policy in their respective organisations.

d) Employees

- Know and comply with the Anti-Corruption Policy and other applicable internal regulations.
- Execute the controls defined by AUDAX in anti-corruption matters.
- Consult the GCO or, if applicable, the local Compliance Officers in case of doubts or questions about this Policy.
- Report in good faith potential breaches of AUDAX's laws and internal regulations, especially in relation to this Policy, through the Whistleblowing Channel.
- Attend and participate in anti-corruption awareness, sensitisation and training activities carried out within the Group.

e) Third parties

- Commit to compliance with the Anti-Corruption Policy or, if applicable, accredit that they have and comply with their own internal rules equivalent to those of Audax.
- Collaborate with the anti-corruption measures deemed necessary by the GCO or the Compliance Officer of the Group subsidiary.
- Report through the Whistleblowing Channel any breach of the law and Audax's internal regulations, especially in relation to the provisions of this Policy.

8. INTERNAL REPORTING SYSTEM - WHISTLEBLOWING CHANNEL

In the event that there is a well-founded suspicion that a possible crime has been committed in relation to this Policy or any other of the Company, the Audax Whistleblowing Channel may be used, integrated in the corporate Compliance and Criminal Risk Prevention Model, which will ensure the maximum confidentiality of the informant's identity and will allow the possibility of reporting anonymously, in case the informant so wishes. Audax will also guarantee that there will be no discrimination or retaliation against whistleblowers who, in good faith, make use of the Whistleblowing Channel.

The whistleblower may also turn to the Public Prosecutor's Office or to the State or Regional Security Forces and Corps, as appropriate, always guaranteeing the rights of the parties involved.

Details of the principles, guarantees and operation of the AUDAX Compliance and Criminal Risk Prevention Model are described in the Corporate Policy of the Internal Information and Whistleblower Protection System and in the Procedure of the Internal Information and Management System of the Whistleblowing Channel.

9. DISSEMINATION AND TRAINING

It is fundamental that the Board of Directors, managers, and employees of Audax be acquainted with and respect this Policy, because this document is of necessary and obligatory compliance for them all.

In order to ensure the compliance with this Policy, the Company (i) will disseminate it as broadly as possible among all the members of the Board of Directors, managers and employees, and (ii) must include this Policy among the areas of mandatory training and communication for the Board of Directors, managers and employees.

Likewise, the communication of the Policy to third parties with whom AUDAX has relations will also be promoted, obtaining their commitment to compliance with the regulation by means of the appropriate contractual guarantees.

10. REPORTING OF BREACHES

If you know or reasonably suspect that a breach of this Policy has been committed, you should immediately notify your line manager, the GCO or report it through the Whistleblowing Channel (which is part of the Internal Information System - IIS or any other similar information system available for this purpose).

11. DISCIPLINARY MEASURES

Any infringement of this Policy or of the applicable Anti-Corruption Laws may involve criminal responsibility of Audax or of its subsidiaries, as well as very severe criminal consequences - for offences committed on their behalf and to their direct or indirect benefit, by their legal representatives or administrators in law or in fact, as well as any other person subject to the authority of the Board of Directors, managers and employees of the Company - including imprisonment as well as large fines, legal expenses and damages to the brands and reputation of the Audax Group. Every member of the Board of Directors, manager or employee who infringes this Policy shall be subject to disciplinary measures of internal nature (in accordance with the stipulations of the Corporate Code of Ethics and Conduct) and/or of external character, with regard to the actions which should be carried out before any authority, entity, administration or Court/Tribunal of Justice of the labour, civil, commercial, criminal or administrative jurisdiction.

The infringements of this Policy shall be sanctioned in accordance with the internal procedures, collective agreements and legal regulations applicable in each country. Moreover, the laws applicable in different jurisdictions where the Audax Group carries out its activity shall be taken into consideration.

In the event of a breach by a third party, AUDAX also reserves the right to take legal action in accordance with the law and may terminate the business relationship in question in advance.

12. REVIEW AND PUBLICATION OF THE POLICY

a) The Group Compliance Officer shall review this Policy annually and, where appropriate, propose to the Audit Committee any modifications deemed advisable, so that the latter may subsequently submit it to the Board of Directors for final approval.

b) It is the responsibility of the Board of Directors of Audax Renovables to ensure the dissemination and general information of this Policy within the Audax Group.

c) This Policy shall be available on the corporate Website of Audax Renovables.

(Text initially approved by resolution of the Board of Directors on 27 February 2024, and its update was approved by the same body on 25 February 2025).

****

ANNEX

Applicable regulations that inspire this Policy

The Audax Group is an international group operating in different countries and geographical areas. On this basis, each country may have specific anti-corruption legislation. This means that Audax is subject to compliance with a wide variety of regulations, including, but not limited to (collectively, hereinafter, the '**Anti-Corruption Laws'**):

- Organic Law 10/1995, of 23 November 1995, of the Criminal Code;

- Law 2/2023, of 20 February, regulating the protection of persons who report regulatory offences and the fight against corruption;

- Local legislation in each country in which the Group operates;

- European Community legislation;

- U.S. Foreign Corrupt Practices Act;

- UK Bribery Act;

- United Nations Convention against Corruption;

- OECD Convention on Corruption;

- ISO 37001 on anti-corruption management systems.

The aforementioned Anti-Corruption Laws inspire the content of this Policy, and it is the duty of the Audax Group to comply with these norms and standards, as well as the content of this Policy, with the aim of ensuring adequate prevention and management of the risk of corruption and bribery.