

# Crime prevention policy

## Objective

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This Policy sets out the principles and standards that members of our organization - and any third parties with whom we interact - are expected to uphold in criminal compliance matters, ultimately with a view to fulfilling the stated purpose, championing the values of Zelestra and developing a business culture based on ethical integrity and honesty. The Code of Ethics and Conduct and all the other policies of our ethics and compliance model underscore our commitment to exercising continuous oversight, penalizing criminal activities or acts of fraud, maintaining effective mechanisms in a bid to improve our record in this respect, and devising training initiatives and information campaigns to make all our employees, executives and directors aware of our values such as integrity, transparency and compliance.

## Commitments

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- Continue to ensure strict compliance with legal provisions currently in force in the locations where our projects are based.
- Introduce and coordinate all measures required to prevent and tackle any illegal activities that may be committed by any of our employees.
- Instill a preventive culture by adopting a zero-tolerance approach to illegal activities and criminal offences, and by requiring all employees, regardless of their level of authority or the country in which they are active, to uphold ethical standards and act responsibly.
- Identify and prevent any criminal risks that may arise in the performance of our business activities, irrespective of the region in which they are undertaken, based on criminal risk potential maps.
- Develop and introduce appropriate procedures to control and comprehensively manage crime prevention in every company of our Group.
- Organize suitable training programs and refresher courses to make sure that our employees' knowledge is up to date.
- Develop processes so that employees and executives are able to monitor their own performance and decisions, based on the following premises: (i) legally valid, (ii) ethically acceptable (iii) making a difference for society and our interest groups and (iv) speak up.
- Cooperate with investigations and audits in good faith and proactively, and immediately report any actual, potential or suspected acts of any breach of the principles described in this Policy to your superior, and/or to Compliance. To this end, the Zelestra Ethical Channel provided, (<https://zelestra.integrityline.com/>), confidential and/or anonymous, guarantees independence, impartiality, the protection of the whistleblower, and the absence of retaliation and conflicts of interest throughout the process of reception, processing and resolution thereof.
- The corresponding authority shall impose appropriate disciplinary measures in accordance with our internal procedures, applicable collective agreements and the regulations in force at any given time.
- The Board of Directors is ultimately responsible for the ethics and compliance model, and in particular for the Anticorruption and Crime Detection and Prevention System. Reporting to the Auditing and Compliance Director, the Chief Compliance Officer shall have the necessary discretionary and supervisory powers to develop, implement, maintain and enforce the Anticorruption and Crime Detection and Prevention System, notwithstanding the responsibilities of other bodies and departments of the Group. In turn, the Audit and Compliance Director is responsible for supervising and monitoring the effectiveness of the Anticorruption and Crime Detection and Prevention System developed by Zelestra, and for ensuring that the Chief Compliance Officer has sufficient resources, autonomy and independence.
- This Crime Prevention Policy and Zelestra's Anticorruption and Crime Detection and Prevention System shall be regularly reviewed and updated by the Chief Compliance Officer to make sure they comply with applicable legal requirements and national and international best practice.

## Scope

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This Policy applies to all the companies of the Zelestra Group, to ZELESTRA CORPORACIÓN, S.A.U., and to those companies in which a majority of the shares, equity interests or voting rights are held, directly or indirectly, or in whose governing or administrative body it has appointed or has the power to appoint a majority of its members, such that it effectively controls the company.

In those investees in which the companies of the Zelestra Group do not have effective control, Zelestra shall promote principles and guidelines consistent with those set forth in this Policy.