



## **Competition Law Compliance Policy**

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## 1. OBJECT

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This **Competition Law Compliance Policy** (hereinafter "the Policy") reflects the **commitment** adopted by **ALFARIVER DEFENSE, S.L.** (hereinafter "**ALFARIVER DEFENSE**" or "the Organization") to achieve its **Competition Law Compliance objectives** and to comply with the provisions of the **Code of Ethics and Conduct on Antitrust**. It has been developed in accordance with the recommendations provided by the **UNE-19603 standard - Compliance Management Systems in the area of Free Competition** constitutes a key element in the **Compliance Management System** (hereinafter, SGC) existing in Organization.

**ALFARIVER DEFENSE** is committed as a priority to develop and maintain a **strong preventive corporate culture** based "**zero tolerance**" towards the commission of **actions against the law**, being critical for the management that this culture of compliance is transferred to the daily decision-making process by all its directors, managers or employees as well as other individuals or legal entities acting on behalf of **ALFARIVER DEFENSE**, facilitating that, from the scope of their respective functions and responsibilities, they are able to detect and prevent practices that could be restrictive of competition. Accordingly, all employees are required to **comply with the regulations**, both **external** and **internal**, expressly prohibiting the commission of any criminal act in the performance of their duties, regardless of whether it is committed for the benefit or to the detriment of the Organization itself, as well as any other initiatives, isolated or concerted, that violate the legislation on defense of competition.

This Policy reaffirms and reinforces the commitment of **ALFARIVER DEFENSE's** management and develops the expected behavior of its employees to **ensure compliance with antitrust rules** in relation to the different anticompetitive behaviors contemplated in Law 15/2007, of July 3, (hereinafter, LDC) and in the rest of European regulations applicable in Spain, as well as in the equivalent regulation applicable in any jurisdiction in which **ALFARIVER DEFENSE** develops its activity, which can be imputable to both legal persons and their managers.

## 2. SCOPE

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This Policy is applicable to **all directors, executives and personnel** of **ALFARIVER DEFENSE**, regardless of the category or functions they perform and the contracting model through which they are linked to the Organization (all of them, hereinafter, "**collaborators**" or "members of the Organization").

Likewise, it may be extended to third parties with which **ALFARIVER DEFENSE** is related. In particular, third parties are considered to be suppliers, subcontractors, consultants or advisors, business partners and collaborators in general (hereinafter referred to as business partners). Our business partners are an extension of **ALFARIVER DEFENSE** and, therefore, must act within the framework of their business relationship with it in accordance with the ethical and conduct principles set out in this Policy, as well as with any other applicable contractual provisions when they intervene on our behalf or in collaboration with us. Likewise, in as far as possible and in a proportional and reasonable manner, we must encourage our business partners to develop and implement management systems that favor the consolidation of an ethical and compliance culture consistent with our standards.

### 3. ROLES AND RESPONSIBILITIES

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Without prejudice to further development in the Compliance Management System, the responsibilities of the bodies involved in **ALFARIVER DEFENSE** are as follows:

- **Management:** is ultimately responsible for **promoting the culture of ethics and compliance** in **ALFARIVER DEFENSE** and must, among other issues, approve the necessary corporate policies and procedures and provide adequate resources for **continuous improvement** of the **Compliance Management System**.
- **Senior management:** must demonstrate an active commitment to the Compliance Management System, ensuring that compliance principles are integrated into the organizational culture.
- **Compliance Officer:** is the figure delegated by the Management Body, with autonomous powers of **initiative and control**, responsible for **supervising the correct functioning and performance of the Compliance Management System**. The **Compliance Officer** is also **responsible for the Internal Information System** for the **diligent management** and **processing** of communications received through the **Ethics Channel**.
- **Other collaborators:**
  - To know and respect the **legislation and internal regulations** applicable to them in the performance of their duties, consulting any doubts that may arise.
  - Execute the planned **controls** and maintain evidence of their correct execution.
  - **Inform** the Compliance Officer in case of identifying **new risk scenarios** or **defects** in the **Compliance Management System**.
  - **Collaborate** with the Compliance Officer as required.
  - **Communicate** any **risk or non-compliance** with the **Compliance Management System**.

### 4. CRIMINAL RISK MANAGEMENT

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**ALFARIVER DEFENSE**'s risk prevention philosophy is based on a complete risk management cycle, comprising the following five phases:

- 1) **Establishment of the context:** determining, on the one hand, the **external environment** in which **ALFARIVER DEFENSE** seeks to achieve its objectives, for example: the legal, social, financial, competitive, etc. environment. On the other hand, the **internal environment** consisting of everything within **ALFARIVER DEFENSE** that may influence the way in which it will manage risk, for example: its governance, structure, policies, objectives, strategies or the functional organization itself.
- 2) **Risk identification:** a process that involves searching for, recognizing, describing and registering risks.

- 3) **Risk analysis:** study of the causes and sources of risk, its consequences and probability of materialization. It consists of understanding the risk to enable decision making.
- 4) **Risk assessment** involves the evaluation of the level of risk known during the analysis process, determining which risks should be treated and their priority.
- 5) **Risk treatment** involves the identification and implementation of corrective or evolutionary actions to prevent or mitigate risks. These actions are always reflected in an **Action Plan**, *integrated in the Compliance Management System*.

**ALFARIVER DEFENSE** will periodically complete this management cycle, so that its Compliance Management System is properly **updated** and **effective** in minimizing its exposure to compliance risks.

## 5. PRINCIPLES OF ACTION

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**ALFARIVER DEFENSE** strictly prohibits:

- Reaching agreements or carrying out concerted or consciously parallel practices between competitors that by their object or effect could restrict competition between economic operators (e.g. fixing prices or other commercial conditions, sharing markets or customers, limiting or controlling production, etc.).
- Anti-competitive manipulation of public or private bids, either through UTEs or unjustified subcontracting, the making of offers of coverage, accompaniment, courtesy, etc. or any other means.
- Accept or implement recommendations or collective decisions issued or adopted by or within associations that could restrict competition among economic operators.
- Exchange commercially sensitive information with competitors or third parties, such as individualized and disaggregated data on strategic variables such as prices, discounts, quantities or present or future sales volumes.
- Carrying out actions that could imply abusive exploitation of a dominant position by means of, among others, imposing unfair or discriminatory prices or commercial conditions, unjustified refusal to supply, or limitation of supply.
- Carrying out acts of unfair competition which, by affecting the public interest, are likely to affect general interest (e.g., acts of deception and confusion, aggressive practices, selling at a loss, violation of secrets, illegal advertising, etc.).

**ALFARIVER DEFENSE** has provided and makes available to all its employees with whom it is related a series of procedures on Antitrust matters in which these principles of action are developed, and which should be understood as a complementary document to this Policy.

In order to promote respect for these principles of action by its employees and business partners, **ALFARIVER DEFENSE** is firmly committed to and requires them:

- To act and demand that action is taken at all times in accordance with the provisions of current legislation on competition law, this Policy and other complementary internal regulations, policies and procedures, applying, where appropriate, the disciplinary regime established, in accordance with applicable labor regulations and Collective Bargaining Agreements, in the event of non-compliance in this area.
- To disseminate the organization's commitment to strict compliance with the law and, in particular, to the defense of competition law, both among its employees and its business partners.
- Disseminate among employees, through appropriate communication and training programs, the importance of performing their duties and responsibilities in accordance with the highest ethical standards and compliance with the law, as well as the main provisions and obligations established by antitrust regulations and the conduct that may constitute an anti-competitive practice.
- To provide **ALFARIVER DEFENSE** employees with the knowledge and tools necessary for them to detect, prevent, avoid and properly manage those situations that may result in breaches of the law or are contrary to the principles and values of **ALFARIVER DEFENSE** and this Policy.
- Promote and demand from its business partners maximum respect for the principles and values of **ALFARIVER**.
- Ensure the greatest possible diligence in the context of public procurement, avoiding any type of irregularity that could be interpreted by the competent authorities as a manipulation of the procedure.
- Collaborate with government agencies, such as the National Markets and Competition Commission (CNMC) and other competition authorities.

## 6. OBLIGATION TO REPORT

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All **ALFARIVER DEFENSE** employees are **required to report** any **risks or non-compliance** with **internal regulations** or **applicable legislation** of which they are aware. Concerns may also be raised in these areas.

For this purpose, **ALFARIVER DEFENSE** has an **Ethics Channel** that is part of its **Internal Information System** and is **accessible** through the following channels:

- **Website of ALFARIVER DEFENSE**, through the URL: [Ethical Channel](#).
- **Postal address**: Polígono Industrial 1, calle C, 24, 28938, Móstoles, (Madrid). In writing addressed to the person responsible for the system, together with the documentation considered necessary.
- **Face-to-face meeting** with the System Manager.

### Rights and guarantees:

- Possibility of **anonymous** communications.
- **Confidentiality** of all persons involved in a communication and of all actions carried out in its processing.

- **No reprisals** against persons who report in **good faith**.
- Tratamiento de **datos de carácter personal** conforme a la **normativa vigente**.
- Right to the **presumption of innocence** and **defense of** the person affected by the communication.

## 7. POLICY DISSEMINATION

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This Policy will be **communicated** and made **available** to all **ALFARIVER DEFENSE** employees.

Any **doubts** that may arise about its interpretation or application, or about any question related to the **QMS**, may be raised with the **Compliance Officer**.

## 8. NON-COMPLIANCE

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Employees are expected to have a proper reading and understanding of this Policy and an ongoing commitment to respect and fully adhere to the principles and behavioral guidelines set forth herein. It is important to remember that all employees have an obligation to report any irregular practices of which they may become aware of or witness.

In the event of **non-compliance** with this Policy, the appropriate **disciplinary measures** may be adopted, always in accordance with current labor regulations and the applicable collective bargaining agreement, and there is a Disciplinary Regime that is part of the Compliance Management System.

No employee of **ALFARIVER DEFENSE**, regardless of his or her hierarchical level, may ask another to commit an act contrary to the regulations (external or internal) or that goes against the provisions of this Policy.

## 9. MONITORING AND UPDATING

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**ALFARIVER DEFENSE**'s Compliance Policies, as well as its Compliance Management System, will be subject to **supervision** and **continuous improvement** to ensure compliance with current and applicable regulations at all times. Periodic verifications will be carried out, as well as specific revisions, in the event of relevant changes that affect the System.

## 10. APPROVAL AND ENTRY INTO FORCE

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This Policy was approved by the Board of Directors in April 2025, effective as of its publication

It shall remain in force as long as it is not modified or repealed by a later one.