



Corporate Criminal Compliance Policy

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REVISION HISTORY

VERSION	DATE	REMARKS
1.0	April 2025	Initial version
2.0	June 2025	Inclusion of an explicit mention of the Organization's activity
3.0	May 2026	Ethics Channel URL Change

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1. PURPOSE

ALFARIVER DEFENSE is a Spanish engineering company for defense and security, with a presence in more than 25 countries and experience in the repair, maintenance, and modernization of armored vehicles, in addition to being an independent distributor of spare parts for military vehicles and equipment. The company also has experience in integrating jamming and communication systems across all types of vehicle platforms. Specifically, our main lines of business are:

- Design, modernization, maintenance, assembly, and repair of wheeled and tracked vehicles, as well as their containers and onboard equipment, ship elements and equipment, units, or installations (bui's), associated with boiler works, services, mechanical, pneumatic, hydraulic, electrical, and electronic systems.
 - Manufacturing of optoelectronic systems, structures, and metallic components (excluding machinery and equipment).
 - Supply of spare parts for motor vehicles and aeronautical systems, personal protective equipment, and camp and quartermaster material.
 - Services in the construction industry, both public and private, including the conservation, restoration, repair, transformation, and extension of works.
 - Supply and maintenance of UAVs.
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This Criminal Compliance Policy (hereinafter, the "Policy") reflects the **commitment** adopted by **ALFARIVER DEFENSE, S.L.** (hereinafter "ALFARIVER DEFENSE" or "the Organization") to achieve its Criminal Compliance objectives, which consist of a firm commitment to develop and maintain a preventive culture based on "zero tolerance" towards the commission of criminal offenses, as well as any other actions that contravene current legislation.

2. This Policy has been developed in accordance with the recommendations provided by the UNE-19601 standard on Criminal Compliance Management Systems and constitutes a key element in the Organization's Compliance Management System.
 3. Accordingly, all employees are required to comply with both external and internal regulations, and the commission of any criminal offense in the course of their duties is strictly prohibited, regardless of whether such an act benefits or harms the Organization.
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4. SCOPE

This Policy applies to **all personnel** of **ALFARIVER DEFENSE**, regardless of their category or the functions they perform, and regardless of the employment model through which they are linked to the Organization, including interns, executives, and the Board of Directors (hereinafter referred to as “collaborators,” “members” of the organization, or “employees”).

It may also extend to third parties with whom **ALFARIVER DEFENSE** engages. Specifically, third parties include suppliers, subcontractors, consultants or advisors, business partners, and collaborators in general (hereinafter, business partners). Our business partners are an extension of **ALFARIVER DEFENSE** and, therefore, must act within the framework of their business relationship with us in accordance with the ethical principles and conduct established in this Policy, as well as with any other applicable contractual provisions when acting on our behalf or in collaboration with us. Furthermore, to the extent possible, and in a proportionate and reasonable manner, we must encourage our business partners to develop and implement management systems that promote the consolidation of an ethical culture and compliance standards consistent with ours.

5. FUNCTIONS AND RESPONSIBILITIES

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

- **Board of Directors:** The ultimate responsibility for promoting the ethical culture and compliance at **ALFARIVER DEFENSE** lies with the Board of Directors, which must, among other things, approve the necessary corporate policies and procedures and provide the adequate resources for the continuous improvement of the Compliance Management System.
- **Top Management:** Must demonstrate active commitment to the Compliance Management System, ensuring that compliance principles are integrated into the organizational culture.
- **Compliance Officer:** The Compliance Officer is **the delegated figure** of the Board of Directors, with autonomous powers of initiative and control, responsible for overseeing the proper functioning and performance of the Compliance Management System. The Compliance Officer is also the **Responsible for the Internal Reporting System** for the diligent management and processing of communications received through the **Ethics Channel**.
- **Other collaborators:**
 - To know and respect the applicable legislation and **internal regulations** in the performance of their duties, consulting any doubts that may arise.

- To execute the **planned controls** and maintain evidence of their correct implementation.
- To inform the Compliance Officer in case of identifying new risk scenarios or defects in the Compliance Management System.
- To collaborate with the Compliance Officer in any matter required.

6. CRIMINAL RISK MANAGEMENT

The criminal risk prevention philosophy of **ALFARIVER DEFENSE** is based on a complete risk management cycle, which includes the following five phases:

Establishing the Context: This involves determining, on the one hand, **the external environment** in which **ALFARIVER DEFENSE** seeks to achieve its objectives, such as the legal, social, financial, competitive, etc., environment. On the other hand, it includes the internal environment, which consists of all factors within **ALFARIVER DEFENSE** that may influence how it manages risk, such as its governance, structure, policies, objectives, strategies, or the organizational structure itself.

- 1) **Risk Identification:** The process of searching for, recognizing, describing, and recording risks.
- 2) **Risk Analysis:** The study of the causes and sources of the risk, its consequences, and the likelihood of its occurrence. It involves understanding the risk to enable decision-making.
- 3) **Risk Evaluation:** This involves assessing the level of risk identified during the analysis process, determining which risks should be addressed and their priority.
- 4) **Risk Treatment:** This involves the identification and implementation of corrective or developmental actions to prevent or mitigate risks. These actions are always reflected in a Compliance Action Plan.
- 5) **ALFARIVER DEFENSE** will periodically complete this management cycle to ensure that its Compliance Management System is properly updated and effective in minimizing its exposure to criminal risks.

7. OBLIGATION TO REPORT

- All collaborators of **ALFARIVER DEFENSE** are obligated to **report** any risk or non-compliance with internal regulations or applicable legislation that they become aware of. It is also the proper channel for raising concerns.

To this end, **ALFARIVER DEFENSE** has an **Ethics Channel**, which is part of its Internal Reporting System and is accessible through the following means:

- **ALFARIVER DEFENSE Website:** Through the URL: [Canal Ético](#)

- **Postal Address:** Polígono Industrial 1, Calle Marcelino Camacho 24, 28938, Móstoles, (Madrid). Letter addressed to the System Responsible along with any necessary documentation.
- **In-person Meeting with the System Responsible.**
- **Rights and Guarantees**
 - The possibility of making communications anonymously.
 - Confidentiality of all individuals involved in a communication and of all actions carried out during its processing.
 - No retaliation against individuals who report in good faith.
 - Processing of personal data in accordance with current regulations.
 - The right to the presumption of innocence and to defense for the person affected by the communication.

8. DISSEMINATION OF THE POLICY

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

Any doubts regarding its interpretation or application, or any questions related to the Compliance Management System, may be raised with the Compliance Officer.

9. NON-COMPLIANCE

In the event of **non-compliance** with this Policy, appropriate disciplinary measures may be taken, always in accordance with the current labor regulations and the applicable collective agreement. No employee of **ALFARIVER DEFENSE**, regardless of their hierarchical level, may request another to commit an act contrary to the regulations (whether external or internal) or that goes against the provisions set out in this Policy.

10.SUPERVISION AND UPDATING

The Compliance Management System of **ALFARIVER DEFENSE** will be subject to supervision and continuous improvement to ensure compliance with the current and applicable regulations at all times. Both periodic verifications and specific reviews will be carried out in the event of significant changes affecting the System

11.APPROVAL AND ENTRY INTO FORCE

This Policy was approved by the Board of Directors in April 2025 and will come into effect upon its publication. Its validity will remain in force unless modified or repealed by a subsequent version.