



Code of Ethics and Conduct

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1. OBJECT

ALFARIVER DEFENSE, S.L. (hereinafter "**ALFARIVER DEFENSE**" or the "Organization" or "the Company") has developed this **Code of Ethics** and Conduct (hereinafter "the Code of Ethics") with the aim of establishing an ethical framework of reference in its relations with employees and third parties, as well as developing the **commitments and guidelines** that should guide all its actions. The Code of Ethics reflects the commitment of **ALFARIVER DEFENSE** with the due diligence to prevent, detect and eliminate possible irregularities, either by breach of the Code itself or the internal rules, including those related to unlawful conduct. The Company considers that this diligence involves, among other aspects, designing and implementing control models that regularly analyze the risks associated with the matters included in the Code, ensuring knowledge of internal regulations, clearly defining responsibilities and establishing procedures to confidentially report any irregularity, facilitate its investigation and apply the necessary corrective measures.

The Code of Ethics is the highest-level regulation in **ALFARIVER DEFENSE**, and its principles are developed in the rest of the policies and procedures that make up the internal regulations.

2. SCOPE OF APPLICATION

The Code of Ethics is **mandatory for all employees** of **ALFARIVER DEFENSE**, regardless of the category or functions they perform and the contracting model through which they are linked to the Organization, including trainees, managers and members of the Administrative Body (hereinafter, "the Professionals and Collaborators" or "the employees" or "the members of the organization").

This Code of Ethics must be respected by all of them in any territory or jurisdiction where they operate in the exercise of their professional activity, and in the strictest respect, always, of the corresponding local legislation.

Likewise, it may be extended to suppliers and other third parties with whom **ALFARIVER DEFENSE** is related, including intermediaries, agents or subcontracted companies, in all the places where it provides services or carries out its business.

3. MISSION, VISION AND VALUES

3.1 Mission

The Organization's mission is to contribute to *national security and defense* through the development and supply of advanced technological solutions and high-quality services to ensure customer confidence in the military and civilian market.

3.2 Vision

ALFARIVER DEFENSE provides its services with the vision of being recognized as a global leader in the defense sector, distinguished by its investment in R&D, support for young talent and the constant development of its services and business lines in order to move towards the technology of the future.

3.3 Values

The values of **ALFARIVER DEFENSE** are the cornerstone that define its identity as an organization and guide all its decisions and actions, being a frame of reference in its relations with third parties.

- Transparency

In the provision of its services and in its relations with third parties, **ALFARIVER DEFENSE** acts in a transparent manner with the aim of showing a true and fair image in order to create a relationship of trust with all business partners and stakeholders.

- Quality

The aim of the services provided by the organization is to provide value to the client, always seeking innovation as the driving force for growth and the key to success. Offering a quality service is the basis on which **ALFARIVER DEFENSE** develops its activity.

- Customer Orientation

Customers are the main focus of **ALFARIVER DEFENSE**'s growth and work strategy. All of the organization's activities are focused on the client, always seeking to provide the services that best suit their needs.

- Respect

Respect for Professionals and Collaborators, third parties and the environment in which the Organization operates is an essential value in the day-to-day work of **ALFARIVER DEFENSE**, ensuring a working environment in which mutual respect prevails and for the development of its activities respecting the environment.

4. COMMITMENTS AND GUIDELINES FOR ACTION

4.1 INTEGRITY IN THE CONDUCT OF OUR BUSINESS

ALFARIVER DEFENSE recognizes the importance of operating with the highest ethical values, ensuring integrity and transparency in all its business relationships. Therefore, all **ALFARIVER DEFENSE** employees must behave ethically in their functions and in their interactions with third parties, complying with the legislation in force and with the internal policies of the Organization.

ALFARIVER DEFENSE prohibits any type of illegal conduct or practice, as well as those that, although not contrary to the law, may be considered irregular or unethical, negatively affecting the name and image of the Organization.

Likewise, **ALFARIVER DEFENSE** will only enter into business relationships with those partners that guarantee, as a minimum, ethical standards similar to those of the Organization.

❖ Fight against corruption

Corruption consisting of offering, promising, giving or accepting an undue advantage, directly or indirectly, to or by a person holding a position of authority or public official, a private person or an employee or representative of a private company, to obtain or retain a business or any other advantage of a fraudulent or illicit nature.

ALFARIVER DEFENSE shows zero tolerance for any form of corruption, influence peddling or abuse of power by a private individual or the Public Administration. The Organization undertakes to carry out responsible and upright practices, complying at all times with both internal and external regulations on corruption.

To this end, an **Anti-Corruption Policy** has been developed, applicable to all Professionals and Collaborators as well as to third parties with whom the Organization maintains business relations.

❖ Gifts and hospitality

ALFARIVER DEFENSE prohibits, in general, requesting, accepting, making and offering gifts, attentions, services, invitations or any other kind of benefit or favor to any person or entity with which it is related.

Professionals and Collaborators, within the scope of their professional activities, must refuse gifts or hospitality received as soon as they become aware of their proposal, and must return them if they are unable to refuse them.

However, on an exceptional basis, token gifts, courtesies or appropriate and reasonable hospitality, generally accepted in business, such as business lunches, hospitality or publicity material, may be given or accepted.

For further details, please refer to the **Anti-Corruption Policy**, which details the organization's policies on this issue.

❖ Relationship with the Public Administration

The Organization has direct and continuous dealings with the Public Administration, participating in numerous public tenders. This means that Professionals and Collaborators must apply ethical and responsible standards in all their dealings with the authorities, promoting a relationship based on integrity, cooperation and transparency.

ALFARIVER DEFENSE, in line with the framework of international conventions and national laws, does not allow actions aimed at unduly influencing any member or representative of public bodies, taking advantage of a previous personal relationship with them or with another collaborator of these bodies, with the purpose of obtaining a resolution that entails an economic benefit for themselves, for **ALFARIVER DEFENSE** or for a third party.

The Organization rejects any action, conduct or omission that may constitute bribery, bribery or influence peddling in relations with public authorities and officials, whether national or foreign.

At the same time, any type of so-called "facilitation payments", i.e. payments made to complete or expedite certain administrative procedures, are prohibited, and any payment of commissions is monitored.

Any Professional or Collaborator who, in the exercise of their duties, or within the Organization, becomes aware of any action that could potentially contravene or exceed the purely professional relations with the Public Administration, must immediately inform the Organization through the whistle-blowing channel provided. This principle will be applicable whether the action comes from a public employee, a Professional or a Collaborator of **ALFARIVER DEFENSE**.

❖ Relationship with our business partners

Our business partners are an essential strategic element to guarantee the quality of the service offered by **ALFARIVER DEFENSE**.

In the normal course of our business, the Organization may use service and product suppliers, agents or intermediaries, or any other third party to help us achieve our objectives, as well as to expand our brand into new markets.

Before entering into a business relationship, we must ensure that these third parties guarantee ethical and compliance standards similar to those of **ALFARIVER DEFENSE**. If they cannot guarantee these standards, they must adhere to the principles contained in this Code.

To ensure that we only work with reputable third parties that have a zero-tolerance policy for corruption, we conduct intensive, risk-based vetting processes before contracting with third parties. In addition, we monitor our third parties throughout the contractual relationship to ensure that they operate to the highest standards of quality and integrity and that they deliver the value to **ALFARIVER DEFENSE** that they promised.

Furthermore, the selection of our business partners is based on the principles of equal opportunities and non-discrimination (applying objective criteria, such as price or quality previously offered), proportionality and transparency, with no personal interests influencing the selection.

❖ **Donations, contributions and sponsorships**

ALFARIVER DEFENSE prohibits the making of donations to political parties and entities of a political nature, or to any foundation or entity dependent on a political party, not adhering to any party or political ideology.

ALFARIVER DEFENSE may only make donations or contributions to non-profit non-governmental institutions, which must be approved in advance by the Administrative Body, always in strict compliance with current legislation, provided that they meet certain requirements (see the Anti-Corruption Policy), and the Compliance Body is informed, which will keep a record of the donations.

Likewise, the sponsorship initiatives of **ALFARIVER DEFENSE** must be directed to reinforce from a promotional point of view the activities and business of **ALFARIVER DEFENSE** and/or to reinforce the brand image with the interest groups of the Organization. In this way, sponsorship initiatives may take the form of monetary or in-kind contributions for the organization of events and other activities related to:

- our solutions and services,
- our markets and areas of activity,
- external relations forums and
- improvement of the corporate image.

Other sponsorship initiatives related to technology, innovation, attracting and developing talent, generating and disseminating knowledge, reducing the digital divide, environmental preservation and sustainability are also valued. These initiatives must, in any case, be approved by the Governing Body.

ALFARIVER DEFENSE will be able to carry out actions of sponsorship of events of cultural, social or sporting nature, following the same directives and guidelines applicable to donations and contributions.

❖ **Managing conflict of interest**

A conflict of interest arises when the personal interests of the Professionals or Collaborators, either their individual interests, or those of their relatives or people with whom they have a relationship, interfere or collide with the interests of **ALFARIVER DEFENSE**.

In the exercise of their functions, all Professionals or Collaborators must act independently of their own interests or those of third parties, guaranteeing the impartiality of their actions. In case of a collision between their personal interests and those of the Organization, the Professionals or collaborators must always act in the interests of **ALFARIVER DEFENSE**.

If you are involved in a situation in which a conflict of interest has arisen, you must immediately notify the Compliance Officer and refrain from intervening in or influencing decision-making.

❖ **Combating the Prevention of Money Laundering and the Financing of Terrorism**

ALFARIVER DEFENSE is committed to compliance with the regulations for the prevention of money laundering and the financing of terrorism.

Money laundering is defined as any activity aimed at concealing or disguising the illicit origin of property or assets, for the purpose of making them appear to have been legitimately acquired. Prohibited conduct in money laundering includes the introduction of the illicit assets into the market (placement); the elimination of any link between the illicit assets and their origin (concealment); and the introduction of the illicitly obtained proceeds into the legal market (integration).

Terrorist financing involves the supply, deposit, distribution or collection of funds or property, directly or indirectly, in the knowledge that they will be used for terrorist purposes.

In this sense, no employee of the Organization may use any mechanism or carry out, individually or collectively, any activity that may favor money laundering or the financing of terrorism and violate its applicable regulations. For its part, **ALFARIVER DEFENSE** undertakes to comply with all regulations and provisions, both national and international, in force in the field of the fight against money laundering and terrorist financing that are applicable to it.

❖ **Antitrust**

At **ALFARIVER DEFENSE** we believe that maintaining good relations with our competitors is fundamental to the success of our business. For this reason, we are committed to the most absolute respect for free competition, to not carry out practices that incur unfair competition and to demand fair competition from our competitors.

Furthermore, no Professional or collaborator may agree on prices, discounts or other conditions; make cover bids or withdraw bids in an agreed manner with other companies, or any agreement aimed at market sharing; use threats, offer or request advantages as consideration for not participating in tenders or bids, whether in the public or private sector; submit bids at below-cost prices; engage in misleading advertising; or engage in any other activity aimed at obstructing the market.

The specific measures relating to the Defense of Competition are developed in the Defense of Competition Compliance Policy and in the **ALFARIVER DEFENSE** Compliance Management System. This document specifies the policies to combat restrictions to free competition, such as collusive behavior, abuse of dominant position and any unfair act of distortion affecting the public interest.

❖ **Public procurement**

ALFARIVER DEFENSE is fully subject to the regulations on public procurement, and especially to the Law 9/2017, of 8 November, on Public Sector Contracts, in all contracts and tenders in which the Organization participates.

Professionals and Collaborators are forbidden, outside legal channels, to request or accept confidential information from bidders or tender processes (either directly or through consultants or third parties), as well as to carry out any action contrary to the defense of competition (see above) or contrary to the laws and regulations against corruption (see **ALFARIVER DEFENSE**'s Anti-Corruption Policy).

❖ **International trade. Trade in defense and dual-use goods.**

Given our international projection, **ALFARIVER DEFENSE** maintains business relations all over the world. In any import or export operation of goods, especially Dual Use Goods and Defense Material, **ALFARIVER DEFENSE** will always act in accordance with the provisions of the applicable regulations and obtaining the corresponding administrative authorization.

Dual-Use Goods are all those products, including software and technology, that can be destined for both civilian and military or nuclear use. Defense Materiel are all products and technologies specifically designed or modified for military use, as well as those intended for their production, testing or use.

Trade in Dual-Use and Defense Goods includes temporary (sample shipments, repairs, replacements, returns, exhibitions) or permanent exports and imports; as well as production or brokering agreements.

Likewise, **ALFARIVER DEFENSE** respects the international sanctions and embargoes imposed by the United Nations Organization (UN), the European Union and Spain, as well as compliance with the legislation of the different countries in which it carries out its commercial activities.

4.2 RESPECT FOR OUR WORKERS

Professionals and Employees are one of the main assets of the Organization. Based on this, **ALFARIVER DEFENSE** puts people at the center of its strategy, investing in them through internal training programs, promoting talent and building a safe working environment in which to work.

❖ **Human Rights**

ALFARIVER DEFENSE is faithfully committed to the respect and promotion of the rights contained in the Universal Declaration of Human Rights and the principles relating to the rights contained in the Declaration of the International Labor Organization.

In this sense, **ALFARIVER DEFENSE** guarantees the freedom of association, the right of association and collective bargaining of all its Professionals and Employees. It also undertakes to prevent child labor and to eliminate forced or compulsory labor.

❖ **Health and safety at work**

ALFARIVER DEFENSE's priority is to promote and preserve a policy of occupational **risk prevention, health and safety at work**, adopting the preventive measures set out in the legislation. The Organization provides all the necessary means so that workers can carry out their activity with the appropriate safety and hygiene measures, so that the protection of life, health and physical and psychological integrity always prevails.

All the Organization's Professionals and Employees must carry out their work in compliance with the occupational health and safety regulations applicable to their respective positions, taking responsibility for compliance with the preventive measures and informing the competent department of any situation of concern, incident or breach of safety regulations of which they may become aware. They also have the

obligation to carry out the training proposed by the Organization with regard to updates on occupational risk prevention.

❖ **Equal treatment and non-discrimination**

The Organization promotes a working environment in which respect for people's dignity, equal opportunities, dialogue and the absence of discriminatory or derogatory behavior are paramount.

Threats, acts of violence or intimidation of any kind, abusive, humiliating or offensive behavior, whether verbal or physical, will not be tolerated, nor will any kind of discrimination or harassment be permitted on the grounds of race, sex, age, nationality, religion, ideology, sexual orientation, identity, trade union membership or any other personal or social condition or circumstance.

In the processes of selection, recruitment, evaluation, training, as well as in promotion and professional development and termination, only objective criteria based on merit, effort and capacity of the candidate shall be taken into account.

If you experience an abusive or discriminatory situation for the above reasons or become aware of such behavior, you should report it immediately through the Ethics Channel, where the information will be handled confidentially (see section 7).

❖ **Prevention of harassment**

The **Organization rejects** any conduct or action that may create an **intimidating or offensive work environment** or that promotes or incites hatred, discrimination, hostility, humiliation or violence. **ALFARIVER DEFENSE** is committed to ensuring a workplace where there are no situations of verbal, physical, psychological harassment or abuse of authority.

For this reason, the Organization will adopt all necessary measures to prevent, detect and resolve any type of harassment. In this sense, the Professionals and Collaborators of the Organization have the obligation to know the policies on conduct at work and prevention of harassment, to behave with due respect with all the people who work or are linked to **ALFARIVER DEFENSE**, not to behave in a violent or threatening way, and to refrain from making any kind of sexual insinuation, offensive jokes or other insulting behavior.

In the event of suffering a situation of harassment or becoming aware of the commission of such activity, it must be reported immediately through the Ethics Channel, where the information will be handled confidentially (see section 7).

❖ **Drug-free work environment**

ALFARIVER DEFENSE promotes a **working environment free of drugs** or any other prohibited or permitted substance (e.g. alcohol) that may alter people's behavior and generate risks for the Professionals or collaborators, for the services provided, or the products.

Therefore, in the exercise of their duties during the working day, whether inside or outside the premises of the Organization, **ALFARIVER DEFENSE** employees may not consume the aforementioned substances.

4.3 RESPONSIBLE MANAGEMENT OF RESOURCES AND INFORMATION

❖ **Accounting liability**

The Professionals and Collaborators of **ALFARIVER DEFENSE** who participate in the accounting processes must comply at all times with the legal provisions, acting diligently to ensure a faithful representation of the economic-financial information, especially the annual accounts. In this respect, they must be guided by the principles of integrity, transparency and truthfulness.

For this reason, the Organization firmly prohibits the recording of transactions in off-the-books media, the keeping of separate accounts, the use of false documents or any kind of artificial practice intended to conceal income or expenditure. In addition, all transactions must be supported by documentary evidence and be verifiable.

❖ Information Security

In the development of its activity, **ALFARIVER DEFENSE** has access to confidential information of its business partners and clients for the correct execution of the contractual relationship, as well as classified information.

The protection of this information is the basis of the trust that business partners and customers place in **ALFARIVER DEFENSE**, therefore, the Organization assumes the commitment to adopt all the measures, both technical and organizational, that are necessary to ensure the safeguarding of this information.

For these purposes, and for guidance purposes only, confidential information includes information relating to strategic, commercial or business plans, agreements with customers and suppliers, plans and designs, databases, salary information, passwords or any other type of financial or other information that has not been published.

Classified information shall be any information so declared by an official body.

All the Professionals and Collaborators of **ALFARIVER DEFENSE** who have access to this type of information must make responsible use of it, avoiding its diffusion and non-authorized transmission.

The same shall apply to so-called privileged information, i.e. any information that the Professionals and Employees know before the general public due to their connection with the Organization, whether it is information of the Organization itself or about other companies. It is forbidden to use (directly or through third parties) such information to buy or sell on the stock markets.

❖ Intellectual and industrial property

ALFARIVER DEFENSE shows its commitment to the protection of intellectual and industrial property, both its own and that of others.

The protection guaranteed by intellectual and industrial property covers trademarks, logos and other distinctive signs, computer programs, patents, utility models, systems, industrial processes, methodologies, designs and any other element susceptible of industrial or intellectual property according to the applicable laws.

In this sense, all intellectual and industrial property that is developed in the work environment and that is related to the activity of the Organization, will belong to **ALFARIVER DEFENSE**, without prejudice to the provisions of the legislation that is applicable at all times and the rights that correspond to its inventor or author.

Likewise, **ALFARIVER DEFENSE** will respect at all times the intellectual and industrial property rights owned by third parties, being forbidden its unauthorized use or disclosure.

The obligation to respect intellectual and industrial property affects both Professionals and Employees in active service and those who no longer work for the Organization.

❖ Protection of Personal Data

The Organization is committed to the right to privacy of all its employees, business partners and customers, especially with regard to their personal data. Access to such **data is restricted exclusively to the persons responsible for processing the data** for the purposes for which they were collected.

ALFARIVER DEFENSE has implemented the necessary measures to protect the personal data of employees, customers, suppliers or third parties that are stored and exchanged in the course of its business. All employees are obliged to process personal data in accordance with the provisions of the data protection regulations in force, as well as with the applicable internal regulations.

In this regard, it is recommended that personal information is collected at a minimum to meet the needs of the Organization and will be used exclusively for business purposes by authorized persons.

❖ Use of corporate devices and resources

ALFARIVER DEFENSE provides its Professionals and Collaborators with the resources and devices necessary for the development of their functions. These must be used in a lawful, appropriate and efficient manner, which implies not being able to appropriate them, nor use them for their own benefit or purposes, or for the commission of acts that may damage the image and reputation of the company.

The use of resources for personal use or for the performance of activities that are not directly related to the Organization is prohibited, and the internal regulations in this respect must be scrupulously complied with.

Furthermore, **ALFARIVER DEFENSE** has the right to inspect, always in accordance with current legislation, the resources and devices that belong to it, as well as the electronic communications that are made with these devices.

4.4 PROTECTION OF THE SURROUNDING ENVIRONMENT

❖ Environment and sustainability

All activities carried out in the Organization must be carried out in an **environmentally friendly manner** and in compliance with the environmental rules, regulations and commitments made voluntarily.

Therefore, all actions must be carried out in such a way that the environmental impact is as low as possible, working to improve efficiency as an organization, identifying and managing the risks and environmental impact generated by its activity.

ALFARIVER DEFENSE is **committed to promoting environmental sustainability**, seeking to reduce its environmental impact through proper waste management, the use of recycled materials, the reduction of electricity consumption and the minimization of greenhouse gas emissions, promoting best practices both with professionals and collaborators as well as with customers, suppliers and all those involved in the supply chain.

All employees of **ALFARIVER DEFENSE** must apply adequate management of resources to guarantee the development of an efficient service, having to ensure an effective and sustainable use of resources, complying with the criteria of sustainability and with the applicable regulations.

5. NON-COMPLIANCE

Failure to comply with this Code of Ethics may lead to the adoption of disciplinary measures, always in accordance with the applicable Workers' Statute and Collective Bargaining Agreement. The provisions of the organization's Disciplinary Policy shall also apply.

No Professional or Collaborator of **ALFARIVER DEFENSE**, regardless of their hierarchical level, may ask another to commit an illegal act or an act that goes against what is established in this Code.

6. COMPLIANCE BODY

ALFARIVER DEFENSE has a **Compliance Management System** that aims to guarantee the development and compliance of an ethical culture.

The Compliance Body is the figure of the **Compliance Officer** its own independence and autonomy, reporting directly to the Administrative Body of **ALFARIVER DEFENSE**, who will provide it with the appropriate and necessary means and resources to carry out its work.

All Professionals and Collaborators are obliged to collaborate with the Compliance Officer whenever they are required to do so for the proper performance of their duties.

7. CHANNEL

All employees of **ALFARIVER DEFENSE** are obliged to report any risk or breach of internal regulations or applicable legislation of which they are aware.

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

- **ALFARIVER DEFENSE** website, at the bottom of the website, in the "Ethical Channel" section, or through this url: https://alfariver.complylaw-canaletico.es/public/8bb62cbea0c964c7847f75cb62171355d399024ebbe915948cdfb3d39490f88a/formulario?_gl=1*15u6c3j*_ga*ODkzMDI0ODE0LjE3Nzg2NjM3Njg.*_ga_DGQS0QFDWK*cze3Nzg2NjM3NjgkbzEkZzEkdDE3Nzg2NjM3NzUkajUzJGwwJGgw
- Postal address: Polígono Industrial 1, calle Marcelino Camacho 24, 28938, Móstoles, (Madrid). Written communication addressed to the System Manager together with the documentation considered necessary (the role of Internal Information System Manager coincides with that of the Compliance Officer).
- Face-to-face meeting with the System Manager.

Rights and guarantees:

- Possibility of making communications anonymously.
- Confidentiality of all persons involved in a communication and of all actions carried out in its processing.
- No retaliation against persons who report in good faith.
- Processing of personal data in accordance with current legislation.
- The right to the presumption of innocence and the right of defense of the person affected by the communication.

8. CODE DISSEMINATION



This Code will be communicated and available to all employees of **ALFARIVER DEFENSE**.

Any doubts that may arise about its interpretation or application, or about any question related to ethics and compliance, may be raised with the Compliance Officer through the corporate e-mail or the ethics channel itself.

In any case, **ALFARIVER DEFENSE** will ensure that the Professionals and collaborators receive continuous training regarding the provisions of this document and the others that make up its regulatory compliance system.

9. MONITORING AND UPDATING

The Code of Ethics and Conduct of **ALFARIVER DEFENSE** will be subject to supervision and continuous improvement to ensure compliance with the regulations in force and applicable at all times. Periodic verifications will be carried out, as well as specific revisions in case of relevant changes that affect the Organization.

10. APPROVAL AND ENTRY INTO FORCE

This Code has been approved by the Governing Body and is effective as of its publication. It shall remain in force until such time as it is amended or repealed by a subsequent Code.