

# CRIMINAL COMPLIANCE AND ANTI-BRIBERY POLICY

PAP Tecnos Innovación, S.A.U. (hereinafter, "PAP Tecnos" or the "Company") is committed to the highest international standards, norms and good practices of corporate governance, business ethics and strict compliance with all applicable laws, rules and regulations.

In this regard, the Company has established this Criminal Compliance and Anti-Bribery Policy (hereinafter, also the "Policy") which builds the guide for action to ensure the promotion of a culture of integrity, ethics and respect for the law, as well as scrupulous respect for the legislation that is applicable to it, especially criminal legislation.

This Policy applies to all Company Personnel, as well as to Third Parties with whom we interact. PAP Tecnos requires full compliance from all its Personnel. Failure to comply may result in disciplinary action, including termination of the employment relationship in the case of Personnel and termination of the existing relationship with Third Parties.

This Criminal Compliance and Anti-Bribery Policy, the Code of Ethics and the rest of the internal policies, procedures and rules (hereinafter, "control measures") constitute the fundamental pillar of the Company's compliance culture and therefore of the Criminal Compliance and Anti-Bribery module of the Integrated Management System. For this reason, this policy is mandatory for all staff, as well as for third parties, requiring not only strict compliance with criminal legislation, but also loyalty to the values and ethical principles of PAP Tecnos.

PAP Tecnos is firmly committed to the continuous monitoring and control of those activities likely to materialize the criminal risks identified in the Criminal Risk Analysis Report.

These criminal risks are likely to materialize, mainly, through the development of the activities inherent to the purpose of the organization, which consist of:

- Carrying out management activities, consultancy and provision of support services in the field of organisational techniques, engineering, administration, etc.
- The development and maintenance of software and hardware.
- Marketing, manufacture, integration and final testing of the products of the company and/or its group as well as their maintenance, incorporating, where appropriate, national technology in the modifications or improvements requested in the target markets.
- Maintenance and repair services of equipment and installation and supply of new systems, equipment and maintenance and repair services in the aeronautical, naval and land sectors, as well as engineering support and technical assistance for new developments required by technological evolution.
- Relations and interactions with Spanish and foreign Public Administrations (especially the Ministry of Defence, the army, navy and air force) and with authorities, public officials and public employees.
- Relationships, interactions, negotiations and/or contracting with Third Parties.
- The hiring of all types of personnel, as well as the establishment and management of labor relations.

This Criminal Compliance and Anti-Bribery Policy, as well as the control measures approved by the Board of Directors, expressly and strictly prohibit the commission of criminal acts of any kind within the framework of the activities carried out by PAP Tecnos and/or in its management and governance. Likewise, this Policy aims to promote and develop a culture of integrity and prevention, based on zero tolerance for any conduct that may contravene criminal legislation, as well as the Criminal Compliance and Anti-Bribery module of the Integrated Management System. This will be articulated through control measures in decision-making by all Related Persons, in order to minimise exposure to any criminal or bribery risk.

The Criminal Compliance and Anti-Bribery Policy establishes a framework for the definition, review and achievement of criminal compliance objectives, through which the Board of Directors establishes processes aimed at:

- Identify and determine the criminal and bribery risks to which PAP Tecnos is exposed in order to implement the necessary control measures to prevent and control such risks.
- Analyze the criminal and bribery risks identified.
- Assess, in terms of probability of materialization and impact in the event of materialization of the identified criminal risks.
- Periodically review the criminal risks to which the Company is exposed. To this end, risk analyses must be carried out, at least on a biennial basis, when there are changes in the control structure that make it necessary or when non-compliance has been identified that could lead to the materialisation of criminal risks, as well as when it is necessary due to new legislation.
- The Board of Directors expresses its full commitment to updating and improving the Criminal Compliance and Anti-Bribery module of the Integrated Management System. To this end, it analyses, at least on an annual basis, the annual report of activities prepared by the Compliance Officer, evaluating its performance and proposing additional measures aimed at strengthening the effectiveness of the Criminal Compliance and Anti-bribery module of the Integrated Management System.

- In order to comply with the established requirements, the Board of Directors appointed an independent, autonomous Compliance Officer with supervision, surveillance and control powers that has the necessary and sufficient technical, material and human resources to ensure compliance with the Company's criminal compliance and anti-bribery objectives.
- Implement processes to manage information and channel complaints of non-compliance;
- Analyze the performance indicators of the Criminal Compliance and Anti-Bribery module of the Integrated Management System.
- Implement corrective actions to the Criminal Compliance and Anti-Bribery module of the Integrated Management System in case of detection of deficiencies in the performance of the Personnel, as well as the Third Parties with whom the Company is related.

PAP Tecnos has established an Ethics Channel, available in all its corporate languages (Spanish and English), on its website, so that all Personnel and Third Parties can access it and report any actual or suspected illicit or unethical behavior, as well as breaches of this Policy, the Code of Ethics, the rest of the Compliance policies, laws or any other internal regulations or specific policies of the Company.

The Ethics Channel is accessible at: [paptecnos.ethic-channel.com](http://paptecnos.ethic-channel.com)

All Personnel must be familiar with the ethical principles and with each and every one of the provisions and obligations contained in the existing control measures, and must comply with them in the performance of any activity related to the Company. Likewise, Senior Management, managers and/or those responsible for the Company's areas have the duty to ensure that all Personnel under their authority observe the Company's rules and principles, guaranteeing that, at all times, in their area of responsibility and control, there are no deviations from the expected conduct that is reflected in the Criminal Compliance and Anti-Bribery module of the Integrated Management System.

BOD Approved

Date: 30/10/2025

