

# **ANTI- CORRUPTION POLICY**



## Approvals and Version Control

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Version	Approval Date	Brief description of the change
1.0	01/25/2018	Implementation
2.0	06/25/2025	Update of various sections (Purpose, Scope, Consequences of non-compliance, etc.) Inclusion of the new link to the Ethics Channel Inclusion of a new section: 6. Globalia's internal controls in the fight against corruption

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# GLOBALIA GROUP COMPANIES



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# 1. PURPOSE

Globalia's Anti-Corruption Policy is another step forward in our organization's steadfast and unwavering commitment to the legality, ethics, and professionalism that guide our business practices and corporate culture.

As a company that operates both domestically and internationally, Globalia is required to comply with various regulations and laws in order to conduct our business activities legally, including those related to the prevention of bribery and corruption, whether in the private sector or in our dealings with public entities. As reflected in Globalia's Code of Ethics, it is our intention to always act in accordance with the law, keeping ethics and values at the forefront of our conduct.

In line with this commitment, we have developed this Anti-Bribery Policy (hereinafter, the Policy), which aims to establish the necessary mechanisms to prevent, detect, and mitigate the risk of criminal offenses in general, and acts of corruption or bribery in particular. This Policy is an essential part of our Integrated Compliance Management System (ICMS), and Globalia's executives, employees, and collaborators must be familiar with the necessary procedures, apply them, and ensure their compliance.

The Organization expressly states its zero-tolerance policy toward any form of corruption, whether active or passive, direct or indirect, including bribery, extortion, influence peddling, or any other conduct contrary to business ethics. Any attempt or suspicion of bribery must be reported through the established channels and will be subject to immediate investigation and action.

In addition to this Policy, the Organization has implemented a Gifts and Invitations Policy, which establishes clear guidelines to prevent risks arising from the giving or acceptance of gifts, invitations, or business courtesies, ensuring that such practices are not used as tools to unduly influence business or institutional decisions.

This Policy clearly and explicitly reinforces the standards and principles that must guide our daily activities, with the aim of avoiding criminal liability for the offense of business corruption and, likewise, observing and complying with the strict anti-bribery and anti-corruption legislation applicable worldwide, as well as the requirements of international standards on compliance and anti-bribery, such as ISO 37001.

Through this Policy, Globalia actively commits to:

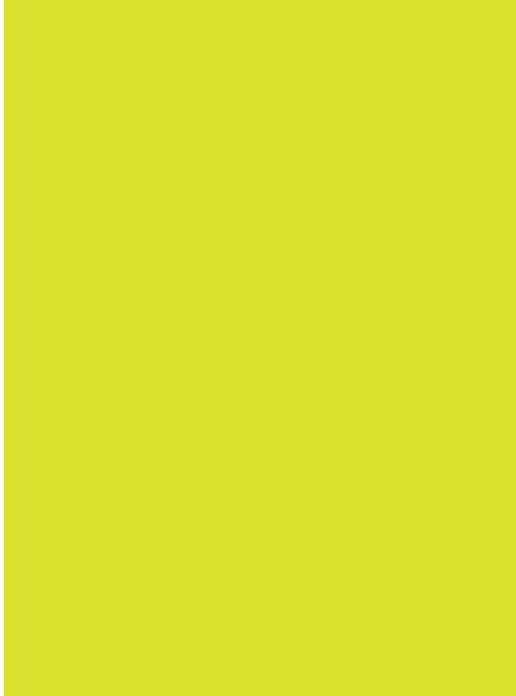
- Full compliance with and absolute respect for all applicable regulations (both national and those of the countries where it operates) regarding the fight against corruption in any of its forms: bribery, illegal payments, the giving of gifts or gratuities, preferential treatment, extortion, and, in general, any other act intended to obtain favorable treatment from public authorities, public officials, or private individuals.
- Adhering to the principles governing its Code of Ethics, upon which the Anti-Corruption Policy set forth herein is based.
- To train and raise awareness among Obligated Parties (as this term is defined below), as well as stakeholders, regarding the importance of complying with this Policy.
- To make available to Obligated Parties the necessary means to confidentially report any possible breach of this Policy, as well as of any other applicable internal or external regulations (ethics channel).

- To sanction any potential non-compliance in accordance with the Disciplinary Regulations.

This Policy, like the SIG, will be subject to a process of continuous improvement to permanently increase compliance levels over time, through review, update, and audit processes.

This version of Globalia's Anti-Corruption Policy was approved by the Board of Directors in June 2025.

## 2. OBLIGATIONS



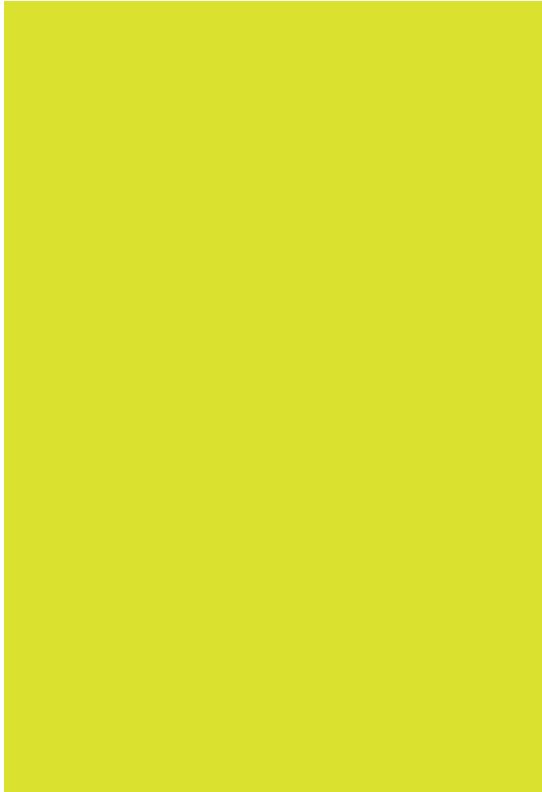
Globalia's obligation regarding payments, in order to act in accordance with anti-corruption laws and measures, is as follows:

Globalia employees and intermediaries are prohibited from making, offering, or accepting bribes, payments, or anything of value for the purpose of improperly securing contracts, business deals, government approvals, favorable tariff or tax regulations, or any other improper business advantage from any entity or individual.

Bribes, kickbacks, or any other illegal or unethical payment or benefit are prohibited, even if they are common practice for others in the country where Globalia may operate.

### 3. SCOPE

This policy applies to the following Obligated Entities and operations:



1. All Globalia operations, regardless of their location.
2. All companies that make up Globalia, as well as those subsidiaries and investee companies over which Globalia exercises effective control or holds a 50% or greater stake.
3. All persons who hold powers of representation at Globalia.
4. Individuals who, de facto or de jure, have management authority at Globalia.
5. All Globalia employees, regardless of their location, position, responsibility, or role within Globalia, including senior executives.
6. Third parties acting under the name of Globalia or providing critical services to it.

Furthermore, it should be noted that this Policy also applies when collaborating with contractors, consultants, and those who refer business contacts, etc., so that these associated parties must be aware of this Policy.

The Anti-Corruption Policy applies both in Spain and abroad, always taking into account the cultural, linguistic, social, and economic differences of the various countries in which Globalia operates.

Globalia will encourage the main stakeholders with whom the Organization interacts (customers, suppliers, external collaborators, etc.) to conduct themselves in accordance with this Policy.

Globalia is committed to managing, implementing, and keeping the Anti-Corruption Policy up to date through the compliance function, which will be responsible for:

- a) Verifying the application of the Anti-Corruption Policy through specific activities, by evaluating the processes for controlling conduct risks;
- b) Promoting the dissemination, awareness, understanding, and compliance with the Anti-Corruption Policy;
- c) Providing guidance on resolving any questions that arise regarding the application of the Anti-Corruption Policy;
- d) Receiving and analyzing reports of violations of the Anti-Corruption Policy;

- e) Conducting investigations into possible acts of non-compliance, with the authority to request assistance from any area or department within Globalia, and proposing appropriate sanctions where warranted;
- f) Promote the rules necessary for the implementation of the Anti-Corruption Policy and the prevention of violations;
- g) Propose to the Board of Directors any amendments or additions to the Anti-Corruption Policy deemed appropriate;
- h) Promote the development and implementation of appropriate training programs, whether in-person, online, or through any other method, that are suitable for Obligated Parties in fulfilling the duties imposed by the Anti-Corruption Policy;
- i) Annually evaluate the changes that should be made to the Anti-Corruption Policy and propose such changes.

It is the responsibility of Obligated Parties to read, understand, and comply with the Policy, as well as to attend the training activities offered by Globalia on the subject.

## 4. CODE OF CONDUCT

Globalia commits to conducting its business activities in accordance with the following rules of conduct:

### 4.1 BRIBERY

It is strictly prohibited to offer, promise, pay, receive, or solicit a bribe or illegal incentive of any kind and in any form, whether directly or indirectly, as the violation occurs the moment an improper offer or payment is made.

### 4.2 FACILITATION PAYMENTS

The practice of facilitation payments is not authorized by Globalia. No offer shall be made, nor shall any gift or benefit be accepted (or solicited) that seeks to facilitate any matter, whether directly or indirectly. Such practices are excluded from the authorized cases set forth in Globalia's Gifts and Invitations Policy.

## 4.3 PUBLIC OFFICIALS

Under the Criminal Code, the offering of gifts or any other form of compensation to an authority, public official, or person involved in the exercise of public office to induce them to perform an act contrary to the duties inherent in their position or an act proper to their position, so that they do not perform or delay an act they are required to perform, or in consideration of their position or function, as well as influence peddling and embezzlement of public funds.

For these purposes, the following conduct is understood to be prohibited and punishable in the performance of any of Globalia's functions and activities:

- Offering, promising, delivering, or authorizing, directly or indirectly, a gift, unjustified benefit, present, advantage, money, item of value, or compensation of any other kind to a public authority, public official, or person engaged in the exercise of public office for the purpose of:
  - i. Influence the acts or decisions of the public official or authority in the performance of their official duties;
  - ii. Influence the public official to perform or refrain from performing acts that fall within the scope of their legal duties and obligations;
  - iii. Obtain an economic advantage;
  - iv. Influence the act or decision of a public authority, with the aim of obtaining or retaining business or obtaining any undue advantage regarding licenses, permits, authorizations, etc.
  
- Directly or indirectly influencing a public official or authority by taking advantage of any situation arising from a personal relationship with that official or with another public official or authority to secure a decision that may directly or indirectly generate a financial benefit. Thus, Globalia will not tolerate the exertion of undue pressure or any type of activity related to influence peddling. For this reason, the following conduct is not permitted:
  - Taking advantage of a family or friendship relationship with a public official in order to force them to make a decision that benefits Globalia. When there is a family or friendship relationship with a public official with whom a professional relationship must be maintained, this must be reported to the Compliance Department.
  - Associating directly, or through intermediaries, with a public official for the purpose of conducting business that may be facilitated by the exercise of their public duties.
  
- Soliciting any gifts or hospitality from partners, business counterparts, or public officials, authorities, or political figures.

Staff shall exercise particular caution when dealing with public officials or personnel working for public administrations.

The Compliance Department will maintain an up-to-date record of all Globalia staff who, due to their job, have regular contact with employees of the Public Administration.

Under no circumstances shall any offer be made if it is deemed that such an offer gives the appearance of compromising the independent, professional, and ethical conduct of the public employee.

## 4.4 DONATIONS TO POLITICAL PARTIES

In this regard, reference is made to the provisions of Globalia's Code of Ethics, which states that the Group operates under the principle of political neutrality, respecting Globalia employees' right to freedom of association, provided that such association does not link Globalia to a specific political ideology or party.

Furthermore, donations to political parties and unions, whether direct or indirect, are strictly prohibited, as established in the Donations and Sponsorship Policy.

## 4.5 DISCOUNTS AND SPECIAL TERMS

Within the framework of business relationships, Globalia may offer discounts or special terms as part of legitimate negotiations, provided they are duly justified, approved in accordance with internal procedures, and documented transparently. Under no circumstances shall such benefits be used as a means to unduly influence business decisions, obtain undue advantages, or facilitate acts that could be interpreted as bribery, either directly or indirectly.

Occasionally, discounts or special commercial terms may be proposed to obtain or retain contracts or business as part of a negotiated commercial agreement. These practices are not considered improper provided that all of the following conditions are met:

- a) it is expressly included in the contract signed between the parties.
- b) they are reasonable and consistent with the business unit's standard practices.
- c) they are not paid in cash or through untraceable means of payment.
- d) they are not contingent on improper decisions or intended to influence the personal conduct of employees, executives, public officials, or third parties, nor do they constitute a personal advantage or private benefit for them.
- e) they are paid to the client's entity and not to individuals or third parties, unless there is valid justification and prior approval by the Compliance function.
- f) if they are properly recorded in our books and entries and comply in all respects with the requirements of the contract.

Any proposal for special terms and conditions must be evaluated from a regulatory compliance perspective, particularly with regard to the prevention of corruption, bribery, or conflicts of interest, and must be approved by the Compliance Department where applicable.

## 4.6 AFFILIATES

In the event that Globalia decides to engage an affiliated party, intermediary, or agent acting on its behalf to:

- Offer a new activity
- Strengthen an existing activity
- Provide services to fulfill practical, regulatory, or legal obligations (operating license, facilities from which to operate)

A series of control measures and precautions must be applied when collaborating with this partner:

1. Conduct appropriate due diligence on the partner (including verification of its owners, executives, and beneficial owners)
2. They must comply with this Anti-Corruption Policy, and it must be confirmed that the associated party has no connection to any potential anti-corruption practices.
3. In the event that the organization or associated party is unable to provide the necessary assurances, the relevant department must refer the matter to the compliance function to obtain further information and determine whether or not to collaborate with the associated party.

In addition, a written record must be kept of any conversation held with the partner, and this record must be retained for at least the duration of the contract. The following points regarding the partner must be established (all this information must be gathered by the relevant department through the appropriate due diligence process)

- a. How does your organization define the concept of bribery? Are there approved procedures or policies in place to prohibit bribery and maintain the necessary controls to prevent it?
- b. Background and reputation. Confirmation that the organization to which it belongs has no connection to corrupt practices.

c. Confirmation that your employees and any other person or organization that may be involved in this collaboration understand the meaning of bribery and have no connection whatsoever to such practices. Is any training provided or communication issued regarding this matter? If so, details must be provided regarding the training or policies implemented in your organization to prevent bribery and corruption.

## 5. GLOBALIA'S INTERNAL CONTROLS IN THE FIGHT AGAINST CORRUPTION

Along with the adoption of this Policy and strict compliance with current regulations regarding bribery, corruption, and extortion, Globalia commits to implementing internal controls as preventive measures against potential corrupt behavior by its Obligated Parties:

- a) The compliance function will ensure that all Obligated Parties are aware of, understand, apply, and disseminate this Policy;
- b) The compliance function will conduct periodic reviews of the compliance with and effectiveness of this Policy and update it as necessary;
- c) Implementation of an ethics channel available to all stakeholders with whom Globalia interacts so that they may report any concerns, inquiries, or irregularities.
- d) Each of Globalia's divisions will identify and review potential criminal risks, and take the necessary measures to mitigate them, thereby complying with the Group's existing Integrated Compliance Management System;
- e) Strict compliance with internal regulations regarding payment methods and terms;
- f) Both internal and external audits will be conducted in all departments affected by the finance area.
- g) Each and every financial transaction carried out shall be supported by appropriate documentation;
- h) Any false entry, notation, or record in the accounting books is strictly prohibited;
- i) The issuance of bearer checks or blank checks is strictly prohibited;
- j) Under no circumstances shall there be any checking accounts in Globalia's name that are not recorded in the accounting records;
- k) Cash payments will not be approved, except for minor amounts necessary for the proper functioning of Globalia in the course of its business and always in accordance with internal regulations regarding payment methods and conditions;
- l) Invoices shall not be paid without first verifying that the service was indeed provided or the goods were indeed delivered, that such provision or delivery was duly authorized and carried out, and that the amounts payable match the contractual terms. In the absence of a contractual document, market prices must always be followed, and at a minimum, a quote or charge note must be provided;
- m) Before approving a payment, it must be verified that the recipient of the payment is the same as the issuer of the invoice, and therefore the issuer of the invoice must be the one providing the service;
- n) The accounting records shall be prepared with due diligence and in strict compliance with the General Accounting Plan and other economic and financial regulations.

- o) Training on this subject, as well as on the Code of Ethics, among other aspects.

The list above highlights some of the many monitoring and control measures implemented by Globalia to eliminate or, at least, mitigate the risk of corrupt behavior within our organization.

## 6. CONSEQUENCES OF NON-COMPLIANCE

Violations of this Policy and of anti-bribery and anti-corruption laws and regulations could result in serious civil, criminal, and/or administrative penalties, both for the Organization and for the individuals involved in the violation. Furthermore, one must not lose sight of the significant reputational damage that such violations could cause to Globalia.



Consequences of non-compliance with this Policy may include the following:

- Criminal liability of the Organization, which could result in significant financial penalties, including heavy fines and other sanctions such as disqualification from contracting with the government, among others;
- Individual legal liability before the courts of the person, whether an individual or a legal entity, who commits the irregularity in question, as well as any potential sanctions that may arise under civil jurisdiction.
- In the case of violations committed by Obligated Parties, application of the sanctions provided for in Globalia's Disciplinary Regime as described in its Integrated Compliance Management

System.

- In the case of violations committed by third parties associated with Globalia, the termination of the contractual relationships binding them, without this giving rise to any liability for Globalia.
- Furthermore, sanctions from more than one jurisdiction may be applied in a single case of bribery or corruption.

Globalia, through its compliance function, is committed to the strict application of the consequences set forth herein in the event of non-compliance or violations of the Policy and current regulations regarding the fight against corruption.

## 6.1 SUPERVISION AND REVIEW

The compliance function is responsible for establishing controls to ensure that business is conducted in accordance with Globalia's Policies as well as applicable laws and regulations.

## 6.2 NOTIFICATION

Any Globalia executive, representative, or employee, as well as any third party, who suspects or becomes aware of a violation of this Policy or of applicable laws and regulations must report it through the Ethics Channel using the following methods:

- ❖ Aviation Division: <https://aireuropa.canaletico.es/>  
[canaletico@aireuropa.com](mailto:canaletico@aireuropa.com)
- ❖ Other divisions of the Globalia Group: <https://globalia.canaletico.es/>  
[cumplimos@globalia.com](mailto:cumplimos@globalia.com)

## 7. Definitions

**Corruption:** Any promise, offer, or granting of a benefit or advantage of any kind made to customers, suppliers, or any collaborator shall be considered corruption when such actions are unjustified and are carried out so that the collaborator, by breaching the obligations of their position in the procurement or sale of goods or in the contracting of services, benefits the employee, manager, or even the entity itself.

The receipt, acceptance, or solicitation of any benefit or advantage of any nature shall also be considered corruption when it involves a breach of the obligations of one's position in the procurement or sale of goods or the contracting of services to favor the provider of the benefit or advantage over third parties.

**Corruption in the Execution of International Contracts:** The offering, promise, or granting of any kind of unjustified benefit, intended to corrupt—either directly or through an intermediary—public officials or foreign officials, with the aim of obtaining or retaining a contract, business deal, or any other competitive advantage in the conduct of international commercial activities, shall be considered an act of corruption.

**Public official or authority:** Any personnel who performs public functions, whether by virtue of their own jurisdiction or by direct provision of law, shall be considered a public official or authority. This definition shall also apply to jurors, arbitrators, mediators, experts, court-appointed administrators or receivers, bankruptcy trustees, or any persons participating in the exercise of public functions.

**Bribery:** The offering or delivery of gifts or remuneration of any kind to a public authority or official so that they perform an act contrary to the duties inherent in their office, or so that they fail to perform or delay an act that they are required to perform.

**Influence peddling:** Exerting influence on a public official or authority by taking advantage of any situation arising from a personal relationship with that official or with another public official or authority, in order to obtain a decision that may directly or indirectly generate an economic benefit for oneself or for a third party.

**Facilitation payments:** These consist of payments, gifts, or benefits of a small amount made to obtain an advantage from a public official, such as the expediting of an administrative procedure, the granting of a license, the securing of a business relationship, or any similar form of favor.

