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## 1 INTRODUCTION

Grupo Segura is aware of its influence on society and therefore wishes to strengthen the control measures in its management and organisational model, complementing the Code of Conduct and Ethics with this Internal Anti-Corruption Policy (hereinafter, the "Policy"). The implementation of this policy requires the proactive involvement of all individuals who perform a professional or business role or are in any way related to Grupo Segura that may entail a risk of bribery or corruption in the terms set out below.

### 1.1 DEFINITION OF BRIBERY AND CORRUPTION

The legal definitions of bribery and corruption may vary from country to country, but both concepts have certain characteristics that are recognised and applied worldwide. On the one hand, bribery can be understood as any act by which an advantage or something of value is offered, promised, given, requested or accepted as an incentive to induce or influence a particular action or decision-making. The object of the bribe may consist of any type of reward, incentive, object or item of value offered to another person, which serves to obtain a commercial, contractual, regulatory or professional advantage.

The RAE defines corruption as: "In organisations, especially public ones, the practice consists of the use of their functions and resources for the economic or other benefit of their managers". Taking this definition into account, in practice an act of corruption involves one person giving and another receiving in an irregular manner, in breach of the regulations and with a conflict of interest between the giver and the receiver, since an act contrary to the position or professional activity is being carried out in order to obtain an illegitimate advantage. The purpose of the conduct described is to carry out acts that are contrary to ethics and the law.

Therefore, for the purposes of this Policy, any Grupo Segura employee who participates in acts of bribery or corruption in the terms outlined above, either actively, passively, or through third parties, will be subject to disciplinary action.

### 1.2 COMMITMENT

At Grupo Segura, we are committed to combating corruption by establishing principles that should guide the behaviour of all the people who make up the Group.

Grupo Segura has a zero-tolerance policy towards conduct that could be considered corruption or bribery, both in the public and private spheres. Consequently, Grupo Segura is committed to fighting corruption in all its forms, including extortion and bribery, and to developing specific policies on this issue.

### 1.3 OBJECTIVE

The purpose of the Policy is to define guidelines for anti-corruption conduct in line with the principles and guidelines adopted by Grupo Segura in its Code of Conduct.

### 1.4 SCOPE OF APPLICATION/RECIPIENTS

This Policy applies to:

- a) Natural people representing legal entities that are members of the governing bodies of Grupo Segura.
- b) Top Management personnel
- c) Employees, regardless of the legal regime governing their relationship with the Group, and regardless of their category and geographical or functional location.
- d) Any customer, supplier, business partner and all those who, directly or indirectly, permanently or temporarily, establish, in any capacity, a contractual or commercial relationship and a relationship of collaboration or work in the interest of Grupo Segura.

Hereinafter, unless otherwise indicated, this Policy refers to this group of people as "Grupo Segura Personnel" or "Personnel".

Consequently, all employees, middle managers, governing bodies and Top Management must:

- a) read and understand the content of this policy and
- b) comply with the principles established therein, behaving with integrity and transparency in commercial relations, avoiding and condemning any conduct that could be considered an act of corruption or bribery in both the public and private sectors
- c) notify the Compliance Officer of any queries or shortcomings, as well as any acts contrary to the law or the Policy of which they are aware.

## 1.5 APPLICABLE REGULATIONS

This Policy applies in addition to Spanish law and international anti-corruption regulations. State, European and international laws shall prevail if they are stricter than this Policy.

## 2 RISK SCENARIOS

This Policy applies to risk scenarios that Grupo Segura Personnel may encounter, establishing minimum standards of conduct.

In all cases, the benefit must be offered or received in a transparent manner, i.e., it must be identifiable and auditable.

### 2.1 GIFTS, INVITATIONS, DONATIONS

#### 2.1.1 Gifts and hospitality

In principle, these advantages or benefits are considered legitimate. However, this Policy regulates them so that they are not misused and could result in corrupt practices, by establishing a series of controls and requirements to regulate them. These requirements and limits shall apply both to relationships between individuals and to relationships with public bodies and administrations.

In short, the acceptance or giving of gifts shall be governed by the following rules:

- Under no circumstances may Grupo Segura employees request, accept or offer gifts in cash or cash equivalents (gift vouchers, securities, shares, etc.).
- Gifts of modest value or symbolic value shall be considered legitimate.
- The intention or purpose behind the gift or invitation must comply with normal standards of courtesy and customary business practices, without any expectation of unjustified commercial compensation or advantage.
- They must be appropriate and proportionate, i.e., socially acceptable, without the risk of their disclosure giving rise to any social reproach.
- Under no circumstances may gifts or hospitality be offered or accepted that are contrary to the law, morality and public order, or that breach the Code of Conduct or existing contractual obligations.
- Gifts in the form of services or benefits (e.g., promises of employment) shall not be accepted or offered.
- As a general rule, gifts and invitations may not be given or accepted if they exceed the amount of 100 euros. If, for reasons of courtesy, an employee must exceed this amount, they must obtain prior authorisation from their immediate superior.

Under no circumstances may any type of gift be accepted, directly or indirectly, regardless of its value, if its purpose is to directly or indirectly favour the person or entity granting it in the procurement of goods or services.

However, when the breach is due to exceeding the established value or frequency, the legitimacy of these may be analysed by requiring prior approval from the Compliance Officer, as well as documenting or recording this fact. The Compliance Officer will assess whether there are extraordinary circumstances that justify it or whether it violates the above rules.

### **2.1.2 Invitations and other promotional expenses**

Invitations can play an important role in strengthening professional and commercial relationships and implementing an effective commercial policy, so this type of expense is permitted, provided that:

- They are related to a legitimate purpose.
- They are not made in such a way that they could be perceived or interpreted as a bribe.
- They are infrequent.
- They are carried out in a place appropriate for business.
- They are appropriate in the context of a business relationship, i.e., they do not exceed the limits considered reasonable in social and courtesy practices.

If, for reasons of protocol, courtesy or other reasons, an employee must offer or accept an invitation that does not meet the above criteria, it must be authorised in advance by their immediate superior or justified afterwards.

On the other hand, the following are prohibited:

- Excessive invitations in the context of the occasion.
- Invitations that include obscene or inappropriate behaviour.
- Invitations explicitly prohibited by law.
- Invitations are explicitly prohibited by the associate/customer/supplier.

### **2.1.3 Trips**

Any expenses arising from meals and possible travel may only be justified for essentially work-related reasons, in accordance with the specific circumstances of each case, always and at all times considering the criteria of austerity and proportionality that govern the Group's behaviour.

In the case of invitations justified for work reasons for non-company personnel, payments must be restricted to reasonable expenses for travel, accommodation and meals. These expenses are restricted to the guests and may not be extended to family, friends or other third parties not related to the event. The payment of holiday or recreational expenses is prohibited.

### **2.1.4 Donations and Sponsorships**

In terms of preventing fraudulent and corrupt practices, employees must follow the following guidelines for conduct:

Contributions made on behalf of Grupo Segura to charitable organisations, sponsorships and patronage must be made with absolute transparency, which requires that they be formalised in writing and expressly stated in the financial statements of Grupo Segura. Likewise, it is necessary to have the formal approval of the contribution by the competent person or body within the Group.

Patronage and sponsorship must not be linked to any type of behaviour on the part of the beneficiary, nor to acts that could be interpreted as promoting a particular group or political party.

In the event that a foundation or organisation is subsidised, it is necessary to analyse and confirm in advance that it has no connection whatsoever with any civil servant, public authority or political party. Likewise, the integrity and solvency of the subsidised entity must be verified and, in particular, whether it has a transparent and reliable management system in place to ensure that the donation will be used appropriately and for the intended purposes.

### **2.1.5 Political contributions**

Grupo Segura is not affiliated with any political party and prohibits any type of contribution to political parties and their representatives or candidates, in the name and on behalf of the company, that constitutes, or could constitute, political implications.

Those who wish to participate in activities of a political or public nature must do so exclusively in a personal capacity and outside working hours.

## **2.2 FACILITATION PAYMENTS, BRIBES AND INFLUENCE PEDDLING**

All of these practices are prohibited by the regulations on which this Policy is based. They are practices that are combated by states through various anti-corruption measures. Grupo Segura rejects any type of conduct that may constitute any of the aforementioned acts of corruption, as well as any act that may be interpreted as such.

### **2.2.1 Facilitation payments**

Facilitation payments are small, inappropriate payments made to a low-level official to ensure or expedite the performance of a routine or necessary action to which the payer is legally entitled. Such payments may be considered a crime under Spanish law and are contrary to this Policy. Personnel are prohibited from making such facilitation payments. In the event that Personnel are asked to make such a payment, they must request proof of the legitimacy of the payment and an official receipt for it. If this is refused, they must refuse to make the payment.

### **2.2.2 Bribery**

Grupo Segura prohibits any conduct that could constitute bribery or attempted bribery in relation to officials, authorities or members of another company, whether directly or indirectly or through an intermediary. Therefore, Personnel are prohibited from delivering any goods or services in exchange for the aforementioned persons ceasing to perform their work or undertaking any other illegal action.

In the event that Staff are asked to give or receive a bribe, they must refuse and report it to the Compliance Officer.

### **2.2.3 Trafficking of influence**

The Spanish Criminal Code punishes public officials or private individuals who influence public authorities or officials by taking advantage of any situation arising from their personal or hierarchical relationship in order to obtain a decision that may directly or indirectly generate economic benefit for themselves or for a third party. Grupo Segura treats this practice in the same prohibitive manner as criminal law and, therefore, it is unlawful to offer or request an undue advantage in order to exert inappropriate influence, real or supposed, on a public official, with the aim of obtaining an undue benefit or advantage for the instigator of the act or for any other person. In the event that Personnel are requested to engage in this practice, they must reject it and immediately report it to the Compliance Officer.

## **2.3 SUPPLIERS AND THIRD PARTIES**

In its relations with third parties, as well as with contractors, suppliers and other interested parties, Grupo Segura must ensure that there are no corrupt practices or practices that violate this Policy.

All third parties who act, or may act, or intercede on behalf of and for the benefit of Grupo Segura must be subject to the relevant due diligence procedures, depending on the circumstances, thus minimising potential risks arising from improper or illegal actions on their part. In any case, these due diligence procedures must be applied in the case of agents, customers, business partners and any third party with whom a letter of intent is signed to carry out projects or any type of commercial development.

Grupo Segura will require all third parties and business partners with whom it establishes commercial relationships to adhere to this policy.

If there are indications that a third party is likely to generate a potential risk of violating the principles contained in this Policy, as well as applicable anti-corruption laws, Grupo Segura or its Personnel shall refrain from contracting or doing business with that third party.

## 2.4 CONFLICT OF INTEREST

This Policy expressly regulates possible situations of "Conflict of Interest". If employees observe a conflict of interest, whether real or potential, it must be reported immediately.

A conflict of interest shall be understood to exist in the following cases:

- Situations of hierarchical dependence or any other circumstance in which employees are in a position to exert direct or indirect influence over other employees.
- Situations in which employees have shares, holdings or interests in client or supplier companies that have contractual or commercial relationships with Grupo Segura.
- Situations in which employees have family ties by kinship up to the second degree, by blood or affinity, with people holding positions in client or supplier companies that have contractual or commercial relationships with Grupo Segura.
- External and remunerated activities carried out by employees in entities that conflict with the social interests of Grupo Segura.
- Any other situations in which employees may be involved in a commercial operation or transaction that puts their personal interests before those of the company, or when such personal interests influence, or may influence, the exercise of the commercial relationship in an improper manner.

All decisions that may involve a conflict of interest in the terms set out above must be justified and documented as evidence of Grupo Segura's commitment to the fight against corruption.

## 2.5 HUMAN RESOURCES

Grupo Segura's HR department must ensure, in relation to its procedures:

- That diligent measures are applied in its selection and recruitment procedures to prevent the hiring of individuals who may be problematic. Thus, in the selection processes, guidelines for action and controls to be applied to candidates and hires are established, with the aim of preventing the incorporation of risk elements.
- Human resources practices, including recruitment, promotion, training, performance evaluation, remuneration and recognition, must be carried out in accordance with the principles protected by this Policy.
- No employee shall suffer retaliation, discrimination, or disciplinary action for reporting in good faith violations or well-founded suspicions of violations of this Policy, or for refusing to participate in acts of corruption, even if such refusal represents a commercial loss for the Company.
- Key personnel in areas exposed to a high risk of corruption shall be trained, receive appropriate education, and be evaluated on a regular basis, without prejudice to the adoption of measures for the rotation of such personnel.

## 2.6 FINANCE AND ACCOUNTING

Transparency is a fundamental principle within Grupo Segura's corporate strategy. Therefore, it will ensure that its finances and accounting comply with current legislation. Grupo Segura is committed to developing, documenting, maintaining and continuously improving its internal financial controls to ensure that all payments are accurately recorded in its books and accounting records.

In order to prevent situations that could be, or be considered, corrupt, Grupo Segura will ensure that:

- All financial transactions are properly identified and recorded appropriately and clearly in the relevant accounting books.
- The accounting books are always available for inspection by the Executive Committee, the Compliance Officer, or another high-level body, as well as by external auditors.
- There are no "off-the-books" or secret accounts, and no documents can be issued that do not clearly and accurately reflect the transactions to which they refer.
- There are no records of non-existent expenses, or liabilities classified or identified incorrectly according to their nature or purpose, or unusual transactions that do not have a legitimate and genuine purpose.
- Cash payments or payments in kind are monitored and made in accordance with the provisions of this Policy.
- No accounting or other relevant documents are intentionally destroyed before the time permitted by law.
- Independent audit systems are in place.
- All legal provisions and national tax regulations are complied with, including those prohibiting deductions for any form of bribery payment.

### **3 REPORTING OF NON-COMPLIANCE. ETHICS CHANNEL**

All persons subject to this Policy are obliged to report or submit queries, through the mechanisms implemented for this purpose, regarding any acts or events that may constitute breaches or violations of which they are aware or suspect, as well as any queries that may arise.

Grupo Segura has an ethics channel for receiving notifications related to irregular conduct or activities, which allows anyone to submit, in complete confidentiality, any queries about these and other issues related to the guidelines of the Code of Conduct, as well as possible violations or breaches thereof, and any conduct or behaviour that is contrary to the law and likely to give rise to criminal liability for legal persons.

The operation of the ethics channel is supported by a protocol for analysing the reports received and communicating them to the Ethics Committee.

This channel is available as a REPORTING CHANNEL on the Group's website: [www.fsegura.com](http://www.fsegura.com)

### **4 PUBLICATION OF THE ETHICAL POLICY**

Grupo Segura will communicate this Policy to all Staff through appropriate communication, training and awareness-raising actions to ensure its proper understanding and implementation. This Policy will be publicised in order to comply with transparency standards, thus facilitating its dissemination to external individuals and entities.

### **5 DISCIPLINARY MEASURES**

Staff who fail to comply with this Policy are subject to disciplinary measures, which will be assessed according to the circumstances and the seriousness of the facts.

Likewise, the applicable legal provisions and internal regulations, as well as labour regulations, will be respected.

Depending on the offence, it may also be subject to individual criminal prosecution and/or civil prosecution in accordance with current legislation.

## **6 APPROVAL AND ENTRY INTO FORCE**

This Policy is approved by the Senior Management of Grupo Segura and comes into force on the day following its approval.

Paterna, 5 March 2026.