



ANTI-CORRUPTION POLICY

Text approved by resolution of the Board of Directors of 25 January 2024.

(Free translation from the original in Spanish. In the event of discrepancy, the Spanish-language version prevails)

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ANTI-CORRUPTION POLICY

1. Introduction

Viscofan S.A. ("**Viscofan**" or the "**Company**") fully rejects all forms of corruption, works under the basic principle of compliance with the laws and regulations in force at all times, and bases its actions on the highest responsible standards. As a signatory of the United Nations Global Compact, Viscofan has made a commitment to uphold the ten principles that it establishes, which includes working towards eradicating corruption in all its forms, such as extortion and bribery as per Principle no. 10.

Within this framework, the Board of Directors of the Company has approved this Anti-Corruption Policy (hereinafter, **the "Policy"**) to prevent any misconduct that may go against the law or against the basic principles of Viscofan's Code of Conduct. This policy is an essential tool for preventing the Company, the group of companies of which Viscofan is the parent company ("**Viscofan Group**" or "**Group**"), and its external partners from engaging in any illegal or unethical behaviour, either directly or indirectly.

If any local laws happen to be stricter than the Policy, those laws will always take precedence and must be followed accordingly.

2. Scope of application

The Policy applies to all Viscofan Group companies, directors, officers and employees of the Viscofan Group ("Subject Persons"). Subject Persons shall receive training aimed at ensuring adequate knowledge to guarantee the development of an ethical culture of integrity and regulatory compliance.

Viscofan expects all persons and companies that collaborate and interact with the Viscofan Group in undertaking its activity, such as suppliers, distributors, agents, consultants or advisors, business partners and collaborators in general ("Business Partners") to take the appropriate measures to ensure fair behaviour and competition in the market. Therefore, Viscofan will share this Policy with its Business Partners whenever the specific existing circumstances allow it.

3. Principles

It is essential to prevent and eradicate corruption, as it can have a significant impact on both businesses and society as a whole.

The principles governing this Policy are as follows:

- Absolute rejection of any action or omission that is directly or indirectly related to acts of corruption.
- Prohibition of any unlawful actions and/or actions that are not in line with current regulations, including the provisions of this Policy. This applies even in cases where individuals claim to be acting on behalf of the Group.
- Subject Persons' obligation to report any facts known to them that contravene the provisions of the Policy. This communication must be made through the Viscofan Ethical Channel.

- Observance of standards of fair market behaviour in accordance with the principles of free competition.

Corruption prevention measures are part of Viscofan's Criminal Prevention Model. Therefore, the principles set out in the Crime Prevention Policy are directly applicable.

4. Standards of Conduct

The Policy has a significant impact on managing risks and preventing bribery, as well as the acceptance or giving of gifts, travel and hospitality expenses, and sponsorships. To ensure that we uphold the highest ethical standards in these areas, the Policy sets out the following Standards of Conduct.

a) Extortion, bribery, influence peddling and facilitation payments

Viscofan prohibits all conduct that could constitute or be related to extortion in all its possible manifestations.

Furthermore, Viscofan rejects any conduct that could constitute bribery or attempted bribery in relation to authorities or officials, whether directly, indirectly or through an intermediary. Accordingly, the giving of gifts, sums, goods, rights or any other goods or services in exchange for the authorities or officials doing or failing to do what they are supposed to do or taking any other unlawful action will not be tolerated.

Any type of activity that could constitute influence peddling is prohibited.

Facilitation payments in any form or form they may take are also prohibited. Gifts may only be accepted or offered in accordance with this Policy.

b) Gifts

Acceptance of gifts

It is strictly prohibited to accept, either directly or indirectly, any type of Gift or any amount that would implicate the Subject Person to breach their obligations and favour the person or entity granting it in the contracting of goods or services.

In any case, the criteria that shall govern the acceptance of Gifts are as follows:

- 1- With regard to the amount of the Gift, it must be proportionate to the circumstances, accepted by social customs and in accordance with industry standards. The Company's Compliance Department shall determine the economic thresholds above which Gifts must be reported and, where appropriate, authorised for acceptance.
- 2- The Gift must be voluntary, it cannot have been previously requested. Likewise, acceptance of the Gift shall not give rise to any expectation of reciprocity on the part of the giver.

- 3- Gifts must be received at the employee's own workplace, never at the employee's private home or at the home of family members and/or close friends. If this is not the case, the line manager must be informed.

It is expressly forbidden to receive Gifts, either directly or indirectly, when any of the following circumstances apply:

- The Gift comes from authorities or public officials.
- The Gift comes from individuals or companies when they are involved in supplier bidding processes in any of the Group companies, provided that the Subject Person participates in the bidding processes or may have influence over the bidding processes.
- The Gift is given in cash or equivalent means, regardless of the amount (e.g. gift cards).

The regulations contained in this paragraph shall not apply:

- Viscofan Gifts to the Subject Persons and from the Subject Persons to each other, whether or not there is a hierarchical relationship.
- Gastronomic invitations made in the course of an existing business relationship, provided that the invitation is reasonable within the context of the business in which it is made.

Gift giving.

The following is forbidden:

- the giving of gifts to public officials and authorities.
- The giving of gifts to persons or companies when they are involved in bidding processes as clients.
- The Gift is given in cash or equivalent means, regardless of the amount (e.g. gift cards).

The Company's Compliance Department shall determine the economic thresholds above which Gifts must be reported and, where appropriate, authorised.

Gastronomic invitations made in the course of an existing business relationship fall outside the scope of these prohibitions, provided that the invitation is reasonable within the context of the business relationship in which it is made.

c) Travel and hospitality expenses

Entertainment or hospitality received from third parties

Any invitations to events or activities organised by suppliers or third-party companies shall be considered as invitations to Viscofan. As such, any expenses related to travel, accommodation, and representation shall be covered by Viscofan and paid in accordance with the internal regulations for processing employee expenses.

These travel, accommodation and representation expenses shall be in accordance with the following criteria:

1. They must be reasonable, in order to avoid any doubt or presumption that Viscofan may be paying any benefit other than its own or that it is attempting to facilitate the attainment of some business.
2. They shall be related to the Group's activity.
3. They will always be understood to be carried out in an institutional capacity. Therefore, decisions regarding attendance and authorisation shall require the approval of the corresponding hierarchical authorities.

Entertainment or hospitality provided by Viscofan

The same criteria apply to Viscofan's assumption of services or hospitality with third parties.

Donations to political parties and their related foundations are prohibited. Viscofan will typically express its opinions through various associations in an effort to achieve a consensus on the industry's position. This will be done in accordance with the principles of action set out in the Code of Ethics, this Policy, and applicable internal regulations

Viscofan will make public the list of relevant associations to which it belongs.

d) Sponsorships

The purpose of any sponsorships that Viscofan may make will be to provide financial aid or contributions to the sponsored parties for the purpose of carrying out their corporate, social, cultural, scientific activities, social contribution in the communities in which it is present, or other activities of a similar nature. In exchange for this support, the sponsored parties will provide advertising activities or other considerations for the Company aimed at strengthening Viscofan's brand and business.

In addition, the Company shall strategically align all sponsorships and take steps to prevent them from being used as a channel for practices that are contrary to this Policy and the Code of Conduct.

5. Breaches

Failure by Subject Persons to comply with this Policy may result in disciplinary actions being taken by the internal bodies authorised to apply it.

Failure by companies or collaborators in general of the Viscofan Group to comply with any of the provisions of this Policy may result in the termination of existing contractual relationships.

To facilitate compliance with this Policy, the Compliance Area is available to the Subject Personnel, where they can raise any doubts regarding its interpretation or practical application. In addition, the Ethical Channel is open to both Subject Personnel and third parties with a legitimate interest, through which possible breaches of the Policy can be reported. Any reports made through the Ethical Channel will be handled in accordance with the Whistleblower Protection Policy.

6. Validity

This document was updated by the Board of Directors of Viscofan, S.A. at its meeting of 25 January 2024 and the Policy comes into force at the time of its publication on the corporate website.