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|  | COMPLIANCE POLICY | Code | CPL_POL_CORP_001 |
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In CELEO we are committed, from the Board of Directors, through the Senior Management and each of its professionals, to promoting an ethical and compliance culture within our organization and within the framework of our activity, which is mainly the promotion, development, execution, management and investment in electric energy infrastructures, both generation and transmission. Our aim is to avoid any behaviour that may contravene the applicable law and the commitments voluntarily assumed by the company, damage the reputation of the company or negatively affect its public image.

Our core Compliance principles are reflected in this Compliance Policy, in criminal and anti-bribery matters, being congruent and appropriate with the aims and purpose of CELEO, and are:

Ethical culture and zero tolerance

In CELEO we encourage among our employees and other stakeholders a behaviour aligned with:

- Development, promotion and strengthening of an ethical and compliance culture within the company, upholding full respect of the applicable law, together with any additional commitments voluntarily assumed by our organization.
- Zero tolerance towards non-compliance or non-observance of criminal legislation, or any other applicable legislation and for the commission of crimes. Likewise, CELEO is committed to complying with the requirements of this Compliance Policy in criminal and anti-bribery matters and the Compliance Management System.

Fighting against fraud, corruption and bribery

- In CELEO we do not tolerate the commission or participation in actions that may imply any kind of bribery, fraud or corruption. To this end, we, encourage and work in the fight against bribery, fraud and corruption, in any of its forms.
- We implement, in our strategical analysis and compliance policies, actions which allow us to prevent, detect and act against any situation or circumstance that may favour any kind of fraudulent act, corruption or bribery. Likewise, CELEO is committed to complying with applicable anti-bribery regulations.

Integrity in our activities

- In CELEO we constantly seek to promote among our employees and other stakeholders the development of their activities in an **ethical** way and with **integrity**, based on the principles of honesty, transparency and respect. In this way, we seek to ensure the fulfilment of fiduciary duties, such as: confidentiality of information, avoiding conflicts of interests and the duty not to take personal profit from business opportunities related to investments, contracts or corporate operations.
- We do not envisage any contribution to political causes in our strategic framework.

Responsibility

- In CELEO we maintain our Compliance Management System (which can be consulted in the procedure and in the risk matrix) to identify the risks associated with each activity process of the organisation, as well as to design and execute the controls needed to mitigate them, in order to minimise the company's exposure to them as much as possible. In addition, we promote training activities and prevention campaigns, and we establish an appropriate framework to define, review and seek to achieve criminal and anti-bribery compliance objectives, aligned with the aims of our organization. In this way, we encourage ethical and responsible behaviour among our employees and company stakeholders.

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- We promote a responsible and transparent attitude, enabling confidential and efficient communication and transparency channels, accessible on our Website. We thus offer guarantees in the transmission of any sensitive information and protection to anyone who, in good faith, communicate any type of irregularity, that contravenes the applicable law, this Policy or, in general, our Compliance Management System, eliminating retaliation of any kind. Celeo members are obliged to report any aforementioned irregular conduct, even if suspected.
- CELEO has approved and implemented a Disciplinary Regulation with the aim of sanctioning individuals who act against current legislation or our internal regulations, including this Policy and the Compliance Management System.
- Our organisation has a structure of various Compliance Committees, depending on the strategic jurisdictions in which it operates, including the CELEO Group Compliance Committee, approved and supported by the Board of Directors and Senior Management. This body is responsible for the control and monitoring of the effective implementation and execution of the Compliance Management System. This body has full authority, independence and autonomy to perform its functions, reporting directly to the Board of Directors.

Continuous improvement

- We are committed to the continuous improvement of our compliance processes at all levels of our organization, fostering an ethical and compliance culture.

VERSION HISTORY

| Version | Date | Summary of changes | Reviewed by | Approved by |
|---------|------------|--|----------------------|--------------------|
| 1.0 | 26-11-2020 | N/A | Compliance Committee | Board of Directors |
| 2.0 | 13-06-2024 | Accommodation to UNE 19601 and ISO 37001 certification process | Compliance Committee | Board of Directors |