



CRIMINAL COMPLIANCE POLICY

We express our willingness to maintain a culture of compliance within the organisation, taking into account the interests and demands of LANTANIA (Grupo Lantania, S.L.U and subsidiaries), its partners, employees, customers, suppliers, regulators, as well as the community (ies) in which we develop our activity, promoting rejection of those behaviours that could constitute a crime and demanding the maximum commitment to what has been stated, which is assumed, by the management body, through this document.


The criminal compliance policy covers all members of LANTANIA, the entities over which it exercises control as well as legally or contractually bound third parties or related business partners. It demands compliance with the applicable criminal legislation, in general, and specifically prohibits them from committing criminal offences consistent with the Criminal Code regarding organisations under the framework of responsibility established by article 31.bis of the aforementioned Code.

Through this Policy, LANTANIA undertakes to:

- Comply with any applicable criminal legislation.
- Approve, implement and improve a criminal compliance management system that meets the requirements derived from the UNE 19601:2017 standard, effectively adopting and executing an organisation and management model that includes suitable surveillance and control measures to prevent or to significantly reduce the risk of perpetration of corporate crimes.
- Identify, analyse and evaluate criminal risk, establishing the appropriate processes, procedures and controls to prevent or mitigate those risks.

- Promote the culture of compliance through, among other actions, the approval and publication of a Code of Conduct that includes a common standard of behaviour with which our company identifies.
- Promote compliance with the provisions of this document.
- Confer the supervision of the operation and compliance of the prevention model implemented to a body with autonomous powers of initiative and control (criminal compliance body).
- Provide resources to the criminal compliance body so that it can carry out its task effectively.
- Impose the obligation to report suspicious facts or conduct or related to criminal risks and non-compliance, guaranteeing that the informant will not suffer reprisals.
- Establish a disciplinary system that adequately sanctions non-compliance with the obligations arising from the criminal compliance management system.
- Periodically examine and verify the criminal compliance management system, modifying the Criminal Compliance Policy and the rest of the criminal compliance management system and/or adopting the actions it deems most appropriate, when appropriate.

LANTANIA ensures the implementation of the necessary measures to achieve the knowledge and commitment to this Policy of all members of the organisation and external collaborators, ensuring that it is available to any interested party on the Company's website.



Federico Ávila Álvarez

President - CEO