

# Crime Prevention Policy



## Purpose

The purpose of this Policy is to **inform the Company's directors, officers, managers, employees, as well as third parties with whom we have a relationship, of our firm rejection of the commission of any criminal offense and our commitment to prevent and fight against any regulatory breach** of a criminal nature that could damage the value of the Company or our image and reputation.

The Code of Ethics and Conduct, together with the rest of the Policies that are part of the corporate crime prevention program, demonstrates our commitment to permanent vigilance and the sanctioning of illicit criminal or fraudulent acts and conduct, as well as the maintenance of effective training and communication mechanisms that serve to raise awareness among all our employees of values such as integrity, transparency, and compliance.

## Our Commitments

- **Comply with and respect the law**, as well as internal rules and procedures.
- **Integrating and coordinating the set of actions necessary to prevent and combat the possible** commission of illegal acts by any of our employees.
- Create an **environment of transparency, integrating the different systems developed for the prevention of crimes**, as well as the maintenance of adequate internal channels to favor the communication of any consultation or possible irregularity contrary to the Criminal Code.
- **Emphasize proactive activities (prevention and detection) as opposed to reactive activities (investigation and sanction)** through the implementation of continuous preventive and detection control systems. The actions of our employees shall be based on responsible, ethically acceptable, and legally valid actions.
- Promote a preventive culture based on **the principle of "zero tolerance" towards the commission of illegal criminal acts** and the application of the principles of ethics and responsible behavior by all employees, regardless of their hierarchical level or country.
- Promote **self-control processes for actions and decision making** by employees and managers. We base our actions on four basic premises: (i) that they are ethically acceptable, (ii) legally valid, (iii) desirable for the company and the Group, and (iv) the professional is willing to assume responsibility for it.
- **Identify and prevent risks (crimes) that may be committed in the development of our Company's activities**, reflecting them on potential criminal risk maps.
- Develop and **implement adequate procedures for the control and integral management of crime prevention** in all the companies of our Group.

The current version of this Policy has been approved by the Moeve Board of Directors on May 19, 2023 and is effective from the moment of its approval.

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## Our Commitments (cont.)

- **Implement training programs for our employees in accordance with applicable legislation** and with sufficient frequency to ensure that their knowledge is updated.
- **Monitor disciplinary and corrective measures by the responsible body**, in accordance with our internal procedures, the applicable collective bargaining agreements, and the legally applicable regulations at all times on: conduct contrary to the law, contributing to preventing or hinder the discovery of crimes, and on the infringement of bringing to the attention of the control bodies the non-compliances detected.
- Ensure that **the Ethics and Compliance Office has the material and human resources necessary to oversee the operation of and compliance with this Crime Prevention Policy** in an effective and proactive manner, without prejudice to the responsibilities corresponding to other bodies and Divisions of the Company and, if applicable, to the Administrative and Management Bodies of the subsidiary companies.
- **Collaborate in good faith and proactively with the investigations and audits that are carried out, as well as the duty to inform the Ethics and Compliance Office of any suspected or actual breach of our ethical principles or applicable regulations**, which may result in criminal sanctions. To this end, we have internal channels developed for this purpose to report possible irregularities to the Audit, Compliance, Ethics and Risk Committee of the Board of Directors, including the Integrity Channel ([moeveglobal.ethicspoint.com](https://moeveglobal.ethicspoint.com)).
- The Ethics and Compliance Office is the unit delegated by the Audit, Compliance, Ethics and Risk Committee of the Board of Directors to **develop, implement, maintain and enforce the compliance management system for the prevention of crimes at Moeve**. To this end, it has the necessary powers of initiative and control to monitor the operation, effectiveness and compliance with the applicable policies, ensuring that the programs are adapted to the needs and circumstances of each of the Group companies at all times, and that the disciplinary systems applicable in each case adequately sanction non-compliance with the measures set forth in the programs, and it shall perform these functions with full guarantees of autonomy and independence without fear of retaliation by any Moeve Group company in Spain, the Board of Directors or any of its executives.

## Scope of Application

**This Policy applies to Moeve, the Group's subsidiaries where effective control is exercised, their directors and employees, and to third parties with whom there are legal relationships and who have adhered to it.**

Additionally, persons acting as representatives of the Group in companies and entities not belonging to the Group, or where our Company does not have effective control, shall promote, to the extent possible, the implementation of principles and guidelines consistent with those set forth in this Policy.