



## FIXALIA ANTI-CORRUPTION POLICY

This Anti-Corruption Policy of FIXALIA Electronic Solutions, s.l.u. (hereinafter, FIXALIA) is a further step in its firm and determined commitment to legality, ethics, and professionalism, which govern the way it conducts its activities and its corporate culture.

Through this Policy, FIXALIA actively undertakes to:

- Fully comply with and respect all applicable regulations (both national regulations and those of the countries where it carries out its activity) in relation to combating corruption in any of its forms.
- Train and raise awareness among the Bound Persons (as this term is defined below), as well as stakeholders, of the importance of complying with this Policy.
- Make available to Bound Persons and third parties the necessary means to confidentially report any possible breach of this Policy.
- Sanction any breach of the provisions established herein.

### 1. Scope of the Policy:

The Policy applies to the following categories of persons (hereinafter, the “Bound Persons”):

- All persons who hold powers of representation of FIXALIA Electronic Solutions, s.l.u.
- Persons who, in fact or formally, have management powers in FIXALIA Electronic Solutions, s.l.u.
- All employees of FIXALIA Electronic Solutions, s.l.u.

FIXALIA will promote that the main groups with which it interacts (partners, associates, clients, suppliers, self-employed professionals, freelancers, third parties with a contractual relationship analogous to the previous two with FIXALIA, external collaborators, etc.) adopt conduct consistent with this Policy.

This Policy is valid both in Spain and abroad, always considering the cultural, linguistic, social, and economic differences of the various countries in which FIXALIA operates.

### 2. Purpose of the Policy

Through this Policy, FIXALIA aims to develop the behavioural guidelines to be followed in the fight against corruption, establishing an internal preventive framework that eliminates or, at least, mitigates corruption risks in the conduct of its activity and serves as a guide and model to follow in combating corruption.

### 3. Prohibited conduct

No economic transaction, contract, agreement, or arrangement shall be carried out where there are sufficient reasons to believe that there may be some link to improper or corrupt activities by the counterparties involved. For these purposes, the following conduct in the performance of any duties and activities for FIXALIA shall be understood as prohibited and sanctionable:

- The offering, promise, authorization, or delivery, directly or indirectly, of any kind of monetary incentive, commission, gift, or remuneration to any employee, manager, or director of other companies or private entities, as well as to authorities, public officials, employees, or managers of public companies and bodies, is strictly prohibited, for the purpose of causing them, in breach of their responsibilities and, where applicable, current law, to act or refrain from acting in order to favour a particular business or obtain an undue business advantage.
- Regarding the prohibition on giving gifts, the “Gift Policy” set out below shall apply.
- Such deliveries, promises, authorizations, or offers are prohibited whether made directly or indirectly through collaborators, partners, associates, agents, intermediaries, or any intermediary person.
- All Bound Persons are obliged to reject and immediately report to Management any request from a third party for monetary incentives, commissions, gifts, or remuneration of the kind provided for in this

section. Bound Persons who maintain relations with Public Administrations must always schedule and document them.

- Facilitation payments or payments to expedite procedures consisting of offering, promising, authorizing, or delivering, directly or indirectly, monetary incentives, commissions, remuneration, or things of value to public officials and civil servants or to employees and managers of private entities in order to expedite judicial or administrative procedures, or procedures of any other nature, are strictly prohibited.
- Donations to political parties and to organizations, associations, or foundations linked to them are prohibited. FIXALIA may not purchase products or services whose profits are directly or indirectly allocated to a political party.

#### 4. Gift Policy

As a general rule, Bound Persons shall neither give nor accept any type of gift or present that may be interpreted as exceeding normal business or courtesy practices and that cannot be considered a “corporate gift.” In particular, any form of gifts, presents, or favours to/from clients, partners, associates, suppliers, collaborators, or any other party is prohibited where such gifts may influence independent decision-making by such parties or by FIXALIA, or may induce the granting of any type of favour to such parties, to FIXALIA, its employees, or third parties.

For the sake of completeness, the following shall be deemed prohibited:

- Gifts in monetary form or equivalent with a value exceeding 150 euros.
- Gifts or hospitality to/from persons related to the counterparty.
- Gifts contrary to the values and principles governing FIXALIA’s corporate culture.

For the above purposes, the following shall be considered persons related to the counterparty:

- Spouses or any person with a similar emotional relationship.
- Ascendants, descendants, and siblings of the counterparty or of the spouse (or any person with a similar emotional relationship) of the counterparty.
- Spouses (or any person with a similar emotional relationship) of the ascendants, descendants, and siblings of the counterparty.
- Legal entities in which the counterparty, by itself or through an intermediary, is in any of the following situations:
  - It holds the majority of voting rights.
  - It has the power to appoint or remove the majority of the members of the management body.
  - It may control, by virtue of agreements entered into with third parties, the majority of voting rights.
  - It has appointed, through its votes, the majority of the members of the management body.
  - In case of doubt, the relevant consultation shall be made to Management, which shall be responsible for validating the suitability and appropriateness of the gift in accordance with this Policy.

#### 5. Communication of the Policy

The content and mandatory nature of this Policy shall be communicated to all Bound Persons by hand delivery, notice board, or electronic means.

#### 6. Reporting irregular conduct

All Employees and third parties may submit to FIXALIA’s Management reports regarding conduct that may involve the commission of an irregularity or any act contrary to the law or to this Policy.

Such report must be made in writing and, although not subject to a pre-established format, must contain at least the following information:

- Identity of the reporting person.
- Reported irregularity, including a detailed description of its circumstances and, where possible, supporting documentation.

- Identity of the persons directly responsible for the irregularity.
- The personal data provided shall be collected confidentially in compliance with the requirements imposed by current data protection legislation.

Without prejudice to the rights corresponding to the persons reported under current regulations, FIXALIA guarantees the confidentiality of the reporting person's identity, as well as that there will be no retaliation for having reported irregularities or for having participated in the investigation procedure.

## 7. Consequences of non-compliance with this Policy

All Employees must comply with this Policy. Non-compliance by Bound Persons shall be sanctioned in accordance with labour legislation and other applicable rules and may entail dismissal or termination of the professional services provided.

The consequences of non-compliance with the Policy shall affect not only the infringer but also those Bound Persons who, by action or omission, have allowed such non-compliance.

FIXALIA reserves the right to unilaterally terminate its relations with third parties in the event that the counterparty breaches the provisions of this Policy.

This Anti-Corruption Policy was approved by FIXALIA's Management on April 10, 2026.

Juanjo Díaz Blas  
General Manager

April 10, 2026