

ANTI-CORRUPTION AND ANTI-FRAUD POLICY

1. INTRODUCTION

The Board of Directors of Solarpack Corporación Tecnológica, S.A., (hereinafter referred to as "Solarpack" or the "Company", and the group of companies, of which Solarpack is the parent company, as the "Solarpack Group"), has approved this Anti-Corruption and Anti-Fraud Policy (hereinafter, "the Policy"), which is integrated into its Corporate Governance Regulations and upholds the values and standards of Solarpack's Code of Ethics.

This Policy has been formulated to combat corruption and fraud in accordance with notable regulatory requirements and established best practices, including the UN Convention Against Corruption and its Anti-Corruption Ethics and Compliance Handbook for Business, the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, the US Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act, the Spanish Criminal Code, the Indian Prevention of Corruption Act, 1988 and other international and domestic regulations.

2. PURPOSE OF THE POLICY

This Policy both underscores SOLARPACK's pledge to tackle corruption/fraud and sets out the measures and procedures introduced to ensure that its business activities are conducted in accordance with the values, general ethical principles and general standards of conduct of its Code of Ethics, with the particular aim of establishing and bolstering the Crime Prevention and Detection System.

All employees, executives and members of governing bodies of all companies belonging to the Solarpack Group (hereinafter, the "Collaborators") and any third parties who represent the Solarpack Group shall transact their business with integrity and transparency, while refraining from and reporting any acts of corruption, fraud or bribery in the public and private sector.

3. SCOPE

This Policy is applicable to all the companies in the Solarpack Group, within the legally established limits.

Where appropriate, the scope of this Policy may be extended to include any natural and/or legal person not connected to Solarpack in an employment capacity.

4. COMMITMENTS

As a member of the UN Global Compact and in accordance with principle 10, SOLARPACK hereby publicly undertakes not to engage in bribery, extortion or any other forms of corruption, and to put into effect specific policies and programmes to prevent corruption and fraud in the public and private sector.

To this end, all members of the Solarpack Group are required to adhere to the following procedures and measures which publicly underscore the Group's zero-tolerance approach to corruption and fraud.

The commitments will be updated as the Solarpack Group's activity evolves, and SOLARPACK is committed to continuously improving its record on corruption and fraud in its areas of influence, as well as in all the countries where it operates.

5. PROCEDURES

- It is strictly forbidden to offer, request and/or accept gifts, favours, services in favourable conditions or invitations to/from suppliers, clients, brokers, agents, advisers, public sector employees¹ or anyone else related to a company belonging to the Solarpack Group, in so far as (i) they involve cash or any equivalent payments (e.g., cheques, etc.) (ii) they are given, or are suspected of being given, either directly or indirectly, as a reward for a previous decision adopted in the interests of Solarpack or a third party; (iii) they explicitly or implicitly involve, or are suspected of involving, a quid pro quo, consideration, or an undue decision or resolution or trade benefits, or (iv) they are offered in view of the position or public office of the receiving party; except in the cases specified in this Policy and in the Code of Ethics.
- Charitable donations, sponsorships and patronage, on behalf or in representation of a company belonging to the Solarpack Group, must be arranged in a completely transparent fashion and in accordance with the standards of the Code of Ethics.
- It is strictly forbidden to make donations, on behalf or in representation of a company belonging to the Solarpack Group, to political parties and to foundations, entities or organisations directly or indirectly linked to political

¹ The term "public sector employee" encompasses any person employed by or acting on behalf of a public authority. This includes all public sector employees and employees of private companies who are considered to be public sector employees under the applicable law. It also includes juries, arbitrators, mediators, experts, court-appointed administrators or comptrollers, insolvency practitioners or any other person operating on behalf of the public office.

parties, politicians or public officials (or related people such as family members, friends, associates, etc.)

- Facilitating payments on behalf or in representation of a company belonging to the Solarpack Group are also forbidden².
- Relations with public sector employees, on behalf or in representation of a company belonging to the Solarpack Group, must comply with the values, general ethical principles and general standards of conduct advocated by SOLARPACK in its Code of Ethics. If relations are maintained with foreign public sector employees, Collaborators must act in strict compliance with local laws in the public official's country of origin.
- Conflicts of interest must be avoided³. The business decisions of all Collaborators must be made in the best interests of SOLARPACK. Collaborators must also anticipate and avoid situations that may lead to a conflict of interest. In the event of a conflict of interest, relations with public sector employees must be avoided. Any conflict of interest must be reported to the Compliance Officer.
- All Collaborators must treat the information they access in the discharge of their professional duties in strict confidence, and must not use this information unduly with a view to promoting their own or third-party interests.
- It is forbidden to engage in any accounting practices which seek to conceal transactions or relevant financial information. SOLARPACK aims to disclose financial information that is free from errors and omissions, and fairly presents the Group's position.
- Any third parties who act, or may be required to act, or mediate on behalf and in the interests of a company belonging to the Solarpack Group will be subject to the corresponding due diligence procedures currently implemented by SOLARPACK.
- SOLARPACK will devise suitable training programmes and make them available online, face-to-face or by any other appropriate method in accordance with applicable regulations. Programmes are renewed whenever it is necessary to refresh the participants' knowledge of these matters.

² Facilitating payments are small unofficial and improper payments made, for example, to a public sector employee or an employee of a customer or supplier with a view to inducing or accelerating a routine or necessary activity for the person making the facilitating payment.

³ A conflict is defined as when the personal interests of a Colleague, or those close to a Colleague, conflict or may at some point in the future conflict with the interests of SOLARPACK and/or may influence or hinder the performance of its normal business activities.

6. MONITORING SYSTEM

The approval of this Policy is the responsibility of the Company's Board of Directors, which, either directly or through a Committee appointed for such purpose, will supervise it, ensure its compliance and periodically review it for its continuous suitability.

The Company will establish an internal monitoring system that allows for the correct implementation of the Policy at all organisational levels, as well as the monitoring of the relevant associated indicators.

7. COMMUNICATION AND STAKEHOLDER ENGAGEMENT

This Policy is communicated and understood within the scope of the organisation and it is available through the information and communication channels that SOLARPACK makes available to all its stakeholders. The policy is publicly available on the [SOLARPACK website](#).

To make it easier for individuals to report any breach of the principles set out in this Policy, a whistleblower channel has been set up, which functions through the email address: claims@solarpack.es. Any complaints or suspicions of improper conduct must be reported through this channel.