COMPETITION COMPLIANCE POLICY

APPROVED BY
THE GOVERNING BODY:

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MODIFICATIONS

VERSION – SECTIONS	COMMENTS – DATE
V.0.- initial document	Prepared, supervised, and approved by the Compliance Committee in the minutes dated 03/11/2022 and by the Governing Body 11/2022

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1. PURPOSE

As part of its commitment to complying with existing legislation, internal standards and ethical values and principles, the Governing Body of CLECE VITAM S.A. (referred to hereinafter as Clece Vitam) provides the necessary means and resources to develop, implement and maintain a Compliance Management System, which includes preventing, detecting and reacting to irregular forms of behaviour that threaten and restrict free competition and equality of opportunities in the marketplace.

This policy adheres to the Guiding Principles for Prevention and the list of prohibited behaviours, and to the ethical values and behaviour standards set out in the Clece Vitam Code of Ethics. Accordingly, Clece Vitam is firmly committed to developing honest and fair competition, and recognises the importance of ensuring compliance with competition regulations and developing a culture of compliance throughout the organisation.

2. SCOPE

This competition compliance policy applies to all activities and is to be observed by all members of Clece Vitam, regardless of their position or role, their type of relationship with the organisation or where in the world they are based.

The policy also extends to relations with third parties, business partners, individuals acting on behalf of the organisation and any foreign subsidiaries and associate companies not under our control, to the extent that they might pose a critical or serious risk to the organisation according to internal procedures. This policy must be understood and applied by them all within their professional capacity.
The policy shall also apply to any companies or organisations that come under the control of Clece Vitam, by adhering to and/or adopting the Comprehensive Compliance Management System.

3. OBJECTIVES

The main objectives of this policy are:

- Ensure observance of the criteria of the Code of Ethics, the Guiding Principles and all of the organisation's other internal standards that comprise the commitment of Clece Vitam to comply with the principles of professional conduct and transparency in all areas of its activity, and to regulate the ethical and responsible behaviours of all Clece Vitam professionals in the course of their activities and, in particular, to comply with regulations

protecting free and fair competition in the marketplace, and to address any consequences resulting from compliance breaches by applying suitable disciplinary measures.

- Develop and ensure effective implementation of an ethical culture of compliance with competition regulations among all Clece Vitam members, regardless of their place of work and where they are based.

- Maintain a policy of zero tolerance throughout the organisation regarding any breach of competition regulations, particularly with regard to any behaviours relating to price fixing, allocating markets, customers and/or contracts, exchanging sensitive commercial information and entering into temporary joint ventures with competitors with no legitimate purpose, in accordance with competition regulations.

- Establish and provide the Clece Vitam Compliance Committee with the necessary powers and competence to prevent and manage any behaviours that undermine free and fair competition, ensuring the committee has the material and human resources needed to act within its remit, promoting ongoing training on matters relating to competition, with the aim of ensuring leadership, autonomy and independence in the discharge of its duties, being answerable and with direct access to the Governing Body.

- Identify, analyse and value the inherent risks relating to competition, establishing suitable procedures and controls to ensure that effective management process and the relevant evaluation, follow-up and monitoring systems are all in place.

- Communication, training and raising awareness of Clece Vitam members, and extending the commitment to business partners and other relevant stakeholders on the content, requirements and nature of the Comprehensive Compliance Management System in matters relating to competition, with the aim of ensuring the system is fully effective and focused on the inherent risk in our activities and how they are carried out.

- The obligation for members and any third parties to inform the organisation directly if they are aware of or have suspicions of any irregular act or behaviour taking place that could constitute a breach of competition regulations.

- Provide the parties concerned with a whistleblowing channel and the operating policy for said channel, in order to comply with the obligation

indicated above, guaranteeing respect for all fundamental rights, particularly those of confidentiality, anonymity and a guarantee of no reprisals for reporting or whistleblowing an incident in good faith.

- Adopt appropriate disciplinary measures for any risks and breaches of the Comprehensive Compliance Management System in matters relating to competition. This policy applies without prejudice to any other legal or contractual liability that may result at the corporate level from the existence of any of the behaviours set out above.

4. ENFORCEMENT, TERM, NOTIFICATION AND REVIEW

This Policy shall come into force right on the date of approval, amendment or update of this document.

It shall be published and distributed for adequate knowledge, being made available for consultation through the corporate web.

Clece Vitam shall review its content with the frequency established in its documented information system and, under extraordinary noes, when significant circumstances of a legal, organisational nature arise, or any other that may require its immediate adaptation and/or updating.