


ANTI-CORRUPTION POLICY



Executed	Revised	Approved
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06/12/2023	06/12/2023	06/12/2023


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REVISIONS RECORD

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1 Introduction

With the entry into force of the two reforms of the Criminal Code that make up the legal framework of criminal liability of legal persons in our legal system, introduced by Organic Law 5/2010 of June 22 and Organic Law 1/2015 of March 30, companies have seen the need to implement effective regulatory compliance systems in order to detect and ultimately prevent the commission of crimes in the development of their usual activities.

This also shows the need to extend said compliance systems to other legal matters (administrative, civil, commercial, etc.) other than criminal law.

A very relevant block of preventive measures will be aimed at establishing best corporate practices for the prevention of corruption, in order to avoid the negative effects that regulatory breaches could entail within the company.

2 Purpose (Scope).

This Corruption Prevention Policy aims to complete and expand everything provided in the Code of Ethics in order to prevent and discover the commission of criminal offenses or any other breaches of regulations related to illegal practices, and its purpose is to identify and avoid all those corrupt practices that may occur within QUANDUM AEROSPACE SL (hereinafter *Quandum*).

Therefore, it intends to complete and adapt other procedures that *Quandum* may currently have in the field of corruption prevention. The current documents in *Quandum* that will be completed with this Policy are the following:

- Money laundering prevention protocol.
- Policy of gifts and courtesies
- Supplier selection and contracting policy


3 General rules for the prevention of corruption

Quandum's commitment to its values with regard to maintaining a firm position in the fight against corruption must be transferred to the daily development of the duties of each of its employees and professionals. Thus, all *Quandum* employees and professionals must adhere, at all times, to compliance with the following principles and obligations:

3.1 Facilitation payments

Facilitation payments are small unofficial and improper payments made to officials to ensure or expedite compliance with a necessary routine or action to which the person making them has a legal right. Facilitation payments are prohibited in most jurisdictions.

Quandum employees may not offer or make, directly or indirectly, any payment in cash, in kind or any other kind of benefit or perks, to any natural or legal person, at the service of any entity, whether public or private. With the intention of:

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- Unlawfully obtain or maintain any business or advantage for oneself or for a third person.
- That natural or legal person abuses his influence, real or apparent, to illegally obtain from any entity, public or private, any business or advantage.

Quandum employees may not directly or indirectly receive any type of payment in cash, in kind or any other kind of benefit or perks, from any natural or legal person, with the intentions described above.

In the event that a *Quandum* employee receives an offer of a facilitation payment from a third party, such as a supplier, they must consult their superior and notify Compliance Officer directly or through communication through the ethics channel (canal.etico@quandum.com).

3.2 Gifts and attention

Quandum employees, as contemplated in the Gifts and Courtesies Policy, may not accept or offer gifts or hospitality whose value or, due to the circumstances in which they are made, exceed what is reasonable according to customary customs and practices between individuals.


This prohibition will be especially applicable in the event that the recipient is a person who, due to the position he occupies, can influence, directly or indirectly, decisions related to *Quandum*, including corporate operations, purchase and sale and/or contracting of goods, equipment or services, and/or issuance of reports, concessions or authorizations of an administrative nature.

For the purposes of applying this standard, permitted gifts or hospitality will be considered those that simultaneously meet the following requirements:

- They are allowed both by the applicable legislation of each country and by the ethical principles of their respective cultures and by internal regulations.
- They are not contrary to the values of ethics and transparency adopted by *Quandum*.
- Do not harm the image or reputation of *Quandum*.
- They are delivered or received in a transparent manner and on an occasional basis, by virtue of a commercial practice or generally accepted courtesy social use, or consist of objects or attentions with a symbolic or economically irrelevant value.
- They do not consist of economic amounts, or values and assets easily liquidated in cash.

Gifts or hospitality offered to or received by *Quandum* employees that do not comply with the requirements of this Policy, and therefore are not permitted, must be rejected or, if received, duly returned.

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When employees have doubts about the reasonableness or acceptability of a gift or invitation, they should consult with their superior, or where appropriate, with the Corporate Committee. Compliance through the internal complaints channel.

Unless expressly authorized, it is not allowed to give gifts, invitations or attention to employees or managers of other companies that exceed the courtesy standards applicable at that time.

Likewise, regardless of the gifts or hospitality offered to, or received by, QUANDUM employees, the hierarchical superior must be informed of the date, gift or hospitality offered or received and the issuer thereof.

3.3 Sponsorships, payments to non-profits entities and political contributions.

It will be prohibited for *Quandum* and any of its employees and professionals in the exercise of their functions, to make contributions to political parties, candidates and political organizations and people dedicated to politics.

Any sponsorship or payment to non-profit entities must be transparent and made in accordance with applicable law.

3.4 Money laundering and terrorism financing prevention


Even if it does not have the status of obligated subject as established in Law 10/2010, of April 28, on the prevention of money laundering and terrorist financing, *Quandum* undertakes to avoid any collaboration with persons and/or entities of those suspected of having money laundering or terrorist financing as their purpose, and to comply with internal regulations and protocols on the prevention of money laundering and terrorist financing.

Quandum employees will refrain from proposing, promoting or facilitating the company's involvement in commercial, commercial or any other operations when they know or have well-founded suspicions that their purpose is to introduce funds from criminal activities into the economic system, hiding their origin. .

Similarly, *Quandum* will refrain from:

- Possessing, using or transmitting assets that have their origin in illegal or criminal activities
- Participate in activities whose purpose is to collect, distribute or supply funds to finance terrorist acts and/or organizations.

In general, and in order to avoid the aforementioned practices, *Quandum* shall formally identify customers who:

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- Propose any type of association that involves the purchase and sale of real estate or commercial entities, the management of funds, securities or other assets, the opening or management of current accounts, savings accounts or securities accounts, the organization of the necessary contributions for the creation, operation or management of companies or the creation, operation or management of trusts ("trusts"), companies or similar structures
- Propose to establish companies or other legal persons;

Quandum employees who observe signs of irregular payments, money laundering or terrorist financing should notify Compliance Officer directly or through the communication channel set up for this purpose (canal.etico@quandum.com).

3.5 Conflicts of interest

Conflicts of interest may arise when the private interests of a person or their close relatives, friends or business contacts diverge from those of *Quandum*. These situations must be disclosed and, when possible, avoided because they may affect the good judgment of an individual in the performance of their duties and responsibilities.

In the event that a *Quandum* employee believes that they may incur in a conflict of interest, they must notify Compliance Officer directly or through the communication channel set up for this purpose (canal.etico@quandum.com).

4 Review and improvement of this policy


This Policy must be reviewed periodically, in order to detect possible weaknesses or points of improvement, proceeding to update and/or improve the contents that are considered necessary. It must also be reviewed, in the event of any regulatory update and/or internal business processes that may be affected by this Policy.

In each of the reviews, *Quandum* must consider, in any case, those legislative modifications that may be applicable to the activities and/or situations included in this Policy and in those related to it.

5 Consequences of breach.

In order for the power of control assumed by *Quandum* through this Policy to be considered effective in achieving the purpose pursued, it is necessary to determine the consequences that will derive from non-compliance with the rules, measures and recommendations established in this Policy by of the employees or professionals to whom it applies.

When there are sufficient indications or a real and effective breach of any of the stipulations contained in this Policy has been demonstrated, *Quandum* will be entitled to

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impose the corresponding sanction according to the seriousness of the infraction committed, respecting the applicable regulations.

All of the foregoing will be applicable without prejudice to the fact that *Quandum* may request compensation for compensation, sanctions or claims that it is obliged to satisfy as a result of said breach, for the benefit of its interests. In this sense:

- a) *Quandum* may request the employee or professional to definitively cease the activity through which the breach of this Policy has occurred.
- b) *Quandum* is empowered to access, block access, interrupt the connection and recover the devices, equipment and other Technological Media of the corporate network that have been used or are being used by employees or professionals for the development of their work activity or for the provision of their professional services. *Quandum* reserves the right to carry out revisions, without prior notice, of the email messages of the users of the corporate network and the LOG files of the server, in order to verify compliance with both the legislation and internal procedures, and prevent, so that said activities may affect *Quandum* as a subsidiary civil liability.
- c) *Quandum* may, in any case, terminate the contract for the provision of services signed with the professional, in accordance with current regulations and without prejudice to the claim for damages incurred as a result of said breach.
- d) *Quandum* may adopt all those disciplinary measures that are applicable to the specific case, considering the type of non-compliance that has occurred and the consequences derived from said non-compliance for it, and may constitute disciplinary dismissal, without prejudice to the damages and losses caused. as a result of said breach.
- e) *Quandum* is empowered to initiate all legal actions it deems appropriate, in accordance with current national legislation, derived from the breach by the employee or professional of this Policy.

The knowledge, observance and respect of this Policy is binding for all *Quandum* employees or professionals, when they directly or indirectly intervene in *Quandum* 's activity.