



COMPLIANCE POLICY

Date: November 2021

Code: PC-04-5.2-01-202111

Introduction

The Compliance Policy of Global Dominion Access, S.A. (hereinafter “**Dominion**”) sets out Dominion's *compliance* commitments and forms an integral part of its **Compliance Scheme**.

Dominion complies with the letter and spirit of the obligations and regulations in the different jurisdictions where it operates and also those it has assumed of its own accord.

Scope of application

This Policy applies to all employees, managers and directors of all the companies that make up Dominion (the "**Obligated Parties**"). For these purposes, "Dominion" shall mean all companies which Global Dominion Access, S.A. controls or may control, directly or indirectly, control being understood to be:

- (i) holding the majority of the voting rights;
- (ii) the right to appoint or remove a majority of members of the Board of Directors; or
- (iii) holding the majority of the voting rights pursuant to eventual agreements made with third parties.

Accordingly, this policy must be made available to all Obligated Parties.

For those investee companies or organisations that Dominion does not have effective control over, Dominion will advocate that these companies or organisations adopt principles and guidelines in line with this policy.

In terms of third parties that Dominion does business with (e.g. suppliers, Dominion will analyse the documentation they submit to confirm fulfilment of their own Compliance model that is in line with Dominion's. Should they not have this information, Dominion will provide them with a copy of this Policy so that they can follow it.

Commitments

Dominion establishes the following commitments regarding *compliance*:

- Promoting a culture of integrity and respect for ethical standards and regulations that allows swift and efficient actions to be taken in the event of risks of non-compliance of these standards and regulations, and that takes account not only Dominion's interests but also the requirements and expectations of its stakeholders.
- Upholding conduct that complies with both ethical standards and regulations.
- Creating a joint compliance model and ensure that it is effectively implemented.
- Establishing a zero tolerance philosophy and avoiding any actions that go against the provisions of this Compliance Policy and the established in-house policies and

procedures, applying disciplinary, corrective or penalty actions under current labour legislation, as necessary.

- Actively rejecting any type of illegal activity.
- Promoting the training and reporting of the Compliance model to company employees, including its directors - as well as third parties associated with the company, as applicable - so that they are familiar with and understand all the compliance regulations and commitments required to carry out their activities.
- Continuously reviewing and updating the Compliance Programme to ensure it is in line with the best practices.

Compliance Programme

Structural items

Dominion has established a Compliance Programme based on the due-control principle, focused on adherence to the commitments set out in this policy, broken down as follows:

- **Leadership and Commitment.**- In general terms, *compliance* is the responsibility of all Dominion members in each of their own particular areas, and specifically of representatives of senior management, who are responsible for its appropriate management, in such a way that:
 - ❖ The Board of Directors, and specifically its Audit and Compliance Committee, is responsible for the guidance, monitoring and control of Dominion's Compliance strategy and policy and for risks and public information in this regard.
 - ❖ The Risk & Compliance Department reports to the Compliance Body (as defined below), the responsibilities of which include promoting knowledge, understanding and compliance with Dominion's commitments set out in its policies, standards and procedures.
- **Criminal risk assessment.**- Dominion follows an ongoing criminal risk identification, analysis and assessment process to identify any criminal risks that Dominion could reasonably anticipate, analyse and assess.
- **Standards, procedures and checks.**- These commitments undertaken by Dominion form part of its in-house regulations, consisting of the [Code of Conduct](#), the corporate policies, standards, procedures and checks that enable and facilitate their effective implementation.
- **Dissemination.**- This Compliance Policy is available to all members of the organisation, as well as business partners and third parties it shares any kind of relationship with. Dominion also performs both internal and external dissemination aimed towards promoting the effectiveness of the Compliance Programme.

- **Training and awareness.**- Dominion is committed to ensuring that particularly vulnerable members of the organisation are appropriately, efficiently and proportionately made aware of and trained in criminal risks, so that they can prevent them, detect them or deal with them as per the criminal compliance management system. Whatever the case, all members of the organisation are made aware of the need to comply with the Code of Conduct, which sets out the standards and conduct expected in order to prevent any criminal risks.
- **Whistleblowing channel.**- Dominion has an appropriate procedure by which queries can be made and possible breaches of the Code of Conduct, or any other corporate standards and policies, can be reported.
- **Disciplinary system.**- A disciplinary system that imposes penalties for the breaching of measures established in the Compliance Programme.
- **Monitoring and Control Body.**- Dominion has assigned an internal body with independent initiative and control powers to oversee operations and fulfilment of the Compliance Programme. This body is also called the “Compliance Body”.
- **Performance assessment.**- Dominion's Compliance Programme is a dynamic tool in that it can be adapted to any legislation or organisational changes. To this end, it is checked on a regular basis and modified when the circumstances so require.

Reporting irregularities

Dominion has set up a corporate channel to report any irregularities or breaches of the Code of Conduct and other internal regulations, as well as any conduct or behaviour that could be considered as moral, sexual or gender-based harassment.

This channel can be accessed via the online form available at the [Ethics and anti-harassment reporting channel](#).

Compliance with this Policy

Dominion ensures that this policy is cascaded to all members of the organisation, as well as to any business partners and other third parties to make its content known and so that its compliance can be evaluated by the different Stakeholders.

Monitoring and Review

The contents of this policy will be reviewed as frequently as established by the Monitoring and Control Body to ensure that Dominion complies with best practices that apply in this area.



This document has been approved by the Board of Directors at the meeting held on **14 December 2021** and comes into effect upon approval thereof.

Document sheet

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Edition	Date	Description