

## Anti-Corruption Policy

At Grupo Piñero, we maintain sustainable and responsible ties with all our stakeholders. The basis of our relationships is dialog, ethics, responsibility and transparency, underpinning our actions in accordance with the principles and values of our Code of Ethics and our contribution to the United Nations Sustainable Development Goals in its 2030 Agenda.

The company rejects, condemns and actively combats any practice contrary to the law, the Code of Ethics, or any of its internal rules, and this applies to all employees or third parties representing Grupo Piñero.

Accordingly, we are committed to:

- Conduct our relationships, functions and actions based on transparency, equal opportunities, honesty, ethics and legality.
- Not accept gifts, invitations and hospitality that are not aligned with the provisions of Grupo Piñero's Code of Ethics.
- Not receive, offer or promise payments in cash, in kind or any other benefit for third parties who are in the service of any organization (public or private) to obtain advantages or conduct business, whatever their nature.
- Avoid any situation that may give rise to an actual or potential conflict of interest. All employees must avoid any action or decision that may affect any Group company, and may be influenced by a particular interest, or by third parties with whom they have a personal relationship.
- Keep strict confidentiality regarding any type of confidential information to which any employee has access as a result of his or her professional duties or tasks. As well as refrain from using it for their own benefit or for the benefit of third parties.
- Undertake periodic anti-corruption training in accordance with job positions and any updates to applicable regulations.
- Communicate to our employees the channels available to report breaches of this Policy or to raise any questions that may arise in connection with its application or interpretation, all through the Ethics Channel.
- Ensure transparency in all operations carried out, avoiding any practice contrary to this Policy and to the Code of Ethics.
- Track and control payments, expenses, transactions and disposal of assets by the company.
- The corresponding body shall carry out all actions to ascertain and investigate the complaints it receives, adopting the appropriate corrective measures, which in turn shall be communicated to the departments involved.
- Collaborate with the Public Administrations as required.

*This Policy was approved by the **Board of Directors of Levantur, S.A.** on June 21, 2022.*