

## ANTI-CORRUPTION AND COMPLIANCE POLICY

This Anti-Corruption and Compliance Policy reinforces the commitment of the Board of Directors of Sociedad Anónima De Electrónica Submarina, S.M.E. ("SAES"), and senior management to **align its ethical values with compliance with the legislation in force** in all the countries in which it operates, with particular emphasis on the **commitment to pursue crimes related to corruption and collaborate with the Justice System**.

This Anti-Corruption and Compliance Policy applies to all members of the organization, as well as third parties who interact with SAES, conveying a clear message of **opposition to the commission of any criminal act**, and SAES's firm resolve to combat and sanction them.

SAES, in its effort to integrate this Anti-Corruption and Compliance Policy throughout its business activities and improve stakeholder trust, has implemented a Compliance Management System that ensures proper control of the Company's information and processes, built on the following pillars:

- Development of a **corporate culture** of ethics, honesty, and transparency aiming to reinforce practices related to good corporate governance and internal control.
- **Implementation of a system** for identifying, assessing, and managing criminal risks, including those related to potentially corrupt behaviours.
- Establishment of **protocols or procedures** that define the process of forming the will of the legal entity, decision-making, and execution.
- **Evaluation and management** of existing financial and non-financial controls within SAES.
- **Continuous training** for employees and executives to understand the importance of Compliance in SAES's business activities, identify and act accordingly to criminal risks, and know the response protocols in case of detecting irregular conduct or the possible commission of a criminal offense.
- Implementation of **due diligence procedures**.

The SAES Board of Directors has entrusted the supervision of the operation and compliance of the Compliance System to the **Compliance Committee**, granting it autonomous initiative and control powers.

Additionally, as an essential part of the Compliance System, SAES has an **open whistleblowing channel for employees and third parties** interacting with the entity, whose guarantees and guiding principles are regulated in the [Ethical Channel Policy](#).

If employees become aware of, or have doubts or suspicions regarding any illicit activity in the performance of their duties, they are obliged to report it immediately, and its management and processing will be carried out in accordance with the content of the [Procedure for Action and Decision in the event of non-compliance with the regulatory system](#).

In any case, SAES will not tolerate any harmful conduct against individuals who, in good faith, report facts that may constitute a breach of this policy and, for this reason, the [Ethical Channel Policy](#) includes protection and support measures for whistleblowers, reported parties, and any other person affected by the communication.

In relation to the above, anyone who violates these provisions will be subject to the relevant **disciplinary measures**, including dismissal in the case of employees, as well as other possible **legal actions and/or sanctions**. Likewise, SAES reserves the right to take whatever measures it deems appropriate against business partners who breach them.

The SAES Compliance Committee will periodically review the content of the Anti-Corruption and Compliance Policy to ensure that it includes current international best practices and recommendations, and will propose the modifications and updates to the Board of Directors that contribute to its development and continuous improvement.