



POLICY OF PREVENTION OF CORRUPTION AND RELATED INFRACTIONS

PURPOSE, SCOPE, AND DEFINITIONS

jp.group carries out its activity in accordance with high standards of professional responsibility and ethics, governed by the principles of its Code of Conduct and Code of Ethics.

1. PURPOSE

This Policy aims to implement the principles of action and the duties set out in the JP.group Code of Conduct on the prevention of corruption and related infractions and professional ethics. This Policy should be read in conjunction with the jp.group Code of Conduct and Code of Ethics available [HERE](#).

2. SCOPE

2.1. This Policy applies to all the companies that make up jp.group and all its staff, whatever the nature of their contractual relationship, role, or the country in which they operate.

2.2. In countries where jp.group is present, where the applicable legal and regulatory standards on anti-corruption are less restrictive, the standards set out in this Policy shall prevail, to the extent permitted by the legal system in question.

2.3. Stricter practices than those set out in this Policy may be implemented in countries where they are required to do so by a mandatory provision of applicable law.

3. DEFINITIONS

For the purposes of the interpretation and application of this Policy, the following definitions shall apply:

- a) jp.group: the group of companies owned and participated in, directly and/or indirectly, by JP Holding Services, S.A.
- b) Employee: members of the governing bodies, managers, employees and trainees;
- c) Code of Conduct: document that includes a set of principles governing the activity of the companies that make up the jp.group, and a set of rules of an ethical and deontological nature to be observed by the respective members of the Governing Bodies and all employees, in its relationship with customers, suppliers and other stakeholders. It is also intended for third parties, contracted by or acting on behalf of jp.group companies, in cases where it can be held responsible for their actions;
- d) Code of Ethics: document that integrates the set of jp.group's values and ethical principles of action and how they should be reflected in its relationship with the different stakeholders;
- e) Corruption and related offences: the crimes of corruption, receiving and offering undue advantage, embezzlement, economic participation in business, concussion, abuse of power, prevarication, influence peddling, laundering, or fraud in obtaining or diverting a subsidy, grant, or credit;
- f) Illegal act: any action or omission, willful or negligent, voluntary or involuntary, that violates any mandatory legal provision;
- g) Third party: any person, natural or legal, who, although not a collaborator, participates in activities promoted by jp.group or has a business relationship with it or similar nature, as a service provider, consultant or supplier of goods or services,

directly or indirectly.

h) Internal reporting channel: internal digital platform that allows, confidentially, or anonymously, ensuring the highest standards of information security, the submission of reports on the practice of illegal acts, or violations of the principles and values of jp.group, so that these acts can be investigated and, if appropriate, sanctioned;

i) Whistleblower: any natural person who reports, or publicly discloses, information about violations, obtained in a professional context;

j) Gifts and Offerings: liberalities, gratuities, gifts, benefits, offers, payment of expenses, entertainment, acts of hospitality or participation in events.

k) Retaliation: any act or omission that, directly or indirectly, occurring in a professional context and motivated by an internal or external complaint or public disclosure, causes or may cause the complainant, in an unjustified manner, material or non-material damage.

ANTI-CORRUPTION MEASURES

4. REGULATORY COMPLIANCE PROGRAM

jp.group has adopted a regulatory compliance program to prevent, detect and sanction acts of Corruption and Related Infringements, consisting of a plan for the prevention of risks of corruption and related infractions ("PPR"), an Anti-corruption Policy ("Policy"), an internal training program ("Training"), and a whistleblowing channel and its policy for reporting and handling of complaints.

5. PRIVACY, CONFIDENTIALITY, AND INTEGRITY OF INFORMATION

In matters of privacy, confidentiality and integrity of information the jp.group Privacy Policy available [HERE](#) applies.

The privacy, confidentiality and integrity of information must be guaranteed. The critical information covers areas as relevant as: financial, human resources, technology, technical specifications, processes, strategic and commercial plans, future products and services, contracts, mergers and acquisitions, trade secrets, economic and financial results, technical specifications, patent applications, prices, and the use of our products, among others.

jp.group undertakes to protect and safeguard the integrity and accuracy of information and to ensure the accuracy of processing methods and the integrity of their media (systems, infrastructure or other assets), to comply with the duties of confidentiality and respect the privacy of information and data protection laws. Not transmitting to unauthorized third parties the data to which it has access and not processing personal information in a manner inconsistent with the purposes for which it was originally collected, unless authorized to do so.

5.1. Privacy of information:

Protecting the privacy of stakeholders and their personal data is a fundamental commitment of all jp.group companies. Privacy refers to personal data - that is, data that can identify or characterize a customer, employee, or any other individual in an individualized way. The concept of personal data includes, among others, name, address, civil or tax identification number, telephone and/or cell phone number, email address, as well as, traffic data (e.g. origin, destination, route, date, type, time, size and duration of services used), location data (any data indicating the geographical position of the terminal equipment and the user of the communications network) and content data (e.g. text messages and TV content).

Protected or confidential information, hereinafter referred to globally as "Information", means all information that, regardless of the medium used, is contained in, but is not limited to:

- a) Works, of any nature, namely graphic, written or sound, unpublished;
- b) Compilations and unpublished information selections;
- c) Documentation of a financial nature;
- d) Know-how, technological data, methods, formulas, demonstrations, samples or studies;
- e) Computer programs or programming blocks in source code or object code form;
- f) Business documents, including customer lists;
- g) Reports, "Drafts", memoranda;
- h) Any intellectual assets, as a set of all and any research results, whether or not protected by any industrial property right;

jp.group ensures the protection of personal data of its employees, shareholders, customers, suppliers, service providers, counterparties, business partners, competitors and other natural persons who may affect or be affected by the activity, products or services of the jp.group companies.

Personal data" means information relating to an identified or identifiable natural person ("data subject"); an identifiable person is a natural person who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, online identifiers, or one or more factors specific to that natural person's physical, physiological, genetic, mental, economic, cultural or social identity.

Customer data includes databases, passwords, email addresses, local and remote access to programs and equipment, authentication processes and files and/or any other information disclosed by any means in that context.

5.2. Confidentiality of information:

Confidential information is defined as information that is proprietary to the company and represents value to the company if:

- a) it is kept secret or
- b) shared under confidentiality conditions defined by the company itself.

It is information that, if used by competitors, could damage the company, and bring undue advantage to competitors. Intellectual property rights are protected by law, but there is a lot of company information whose value, not being under such laws, can only be protected by confidentiality.

5.3. Integrity of Information

Information integrity exists when:

- a) no modifications are made to the information or its supporting resources (systems, platforms, infrastructure, other assets) by unauthorized persons or processes;
- b) no unauthorized modifications are made by authorized persons or processes;
- c) data has internal and external consistency (e.g., internal information is consistent with the external situation)

With regard to the use of information, jp.group employees shall:

- Maintain the integrity of the information.
- Respect privacy rights of the information.
- Not share with jp.group confidential information owned by other companies where they have previously been employed.
- Not share confidential information with people outside jp.group, including family and friends.
- Not discuss confidential information in public places where such information can be overheard by others.
- Don't leave confidential information in places where it can be accessed by others.
- Not copy confidential information to computers or systems that do not belong to jp.group.
- Protect confidential information at all stages of its management cycle: creation, collection, storage, use, transmission, and disposal.
- Refuse access to information that meets at least one of the following requirements:
 - (1) it is confidential;
 - (2) it was obtained by illegal, unlawful or unethical means;
 - (3) it violates any standard or principle of this code.
- Inform the company of any actual or suspected unauthorized access to jp.group systems and information.

6. PREVENTION OF CORRUPTION AND RELATED INFRACTIONS - RULES OF CONDUCT AND ACTION

6.1. jp.group strongly repudiates any corruptive practice or related offence, whether active or passive, and other forms of undue influence or illegal conduct, imposing strict compliance with these principles in all its internal and external relationships, whether with private or public entities.

6.2. All jp.group Collaborators shall comply with applicable national and international standards to combat Corruption and Related Offences, being expressly forbidden any and all behaviors that may embody the practice of the crime of corruption or related offence under the law.

6.3. In its performance:

6.3.1. jp.group does not allow its employees, in the course of their duties or because of them, to accept, request, promise or offer professional courtesies, except as provided for in “gifts and offers”, in the jp.group Code of Conduct that you can consult [HERE](#);

6.3.2. In matters of invitations and events, jp.group staff shall consider the provisions of the jp.group Invitations and Events Procedure which you can consult, in the shared folders dedicated to the RGPC theme;

6.3.3. In matters of political donations or contributions, in relations with political parties, governments, public bodies, with officials, political office holders, and holders of senior public office, jp.group contributors should consider that the provisions of the Code of Conduct on “lobbying” apply;

6.3.4. jp.group contributors shall not deal on their own account or in competition with it, and shall be prevented from obtaining personal benefits, advantages or favors by virtue of the position held or functions performed, and the provisions of the Code of Conduct on “conflict of interest” shall apply;

6.3.5. jp.group, in its relationships with suppliers, service providers, agents, consultants, intermediaries and other persons with whom it enters into business relationships, shall ensure that they share the same ethical principles followed by it and provided in the jp.group Code of Conduct, and that they comply with applicable national and international provisions on the prevention of corruption. The hiring of Third Parties shall observe the following criteria:

6.3.5.1. There must be a legitimate need for the services or goods to be procured;

6.3.5.2. The price charged for the services and/or goods shall correspond to market value, unless there is a legitimate reason for not doing so;

6.3.5.3. The third party should be considered adequate from the perspective of the degree of exposure to the risk of corruption;

6.3.5.4. Best efforts should be made so that in contracts to be signed an anti-corruption clause or agreement is included, for example by attaching our internal model Code of Conduct for Suppliers and attaching a copy of this Policy, which should also be sent or delivered to existing suppliers and service providers.

6.4. In determining the Third Party’s degree of exposure to corruption risk, jp.group shall take into consideration the following risk indicators (“Red Flags”):

6.4.1. The transaction/business involves a country known for corrupt payments;

6.4.2. The Third Party has a close family, personal or professional relationship with officials (domestic, foreign or from international organizations), political office holders (domestic or foreign) and holders of high public office;

6.4.3. The Third Party opposes the insertion of anti-corruption clauses in contracts to be concluded with jp.group;

6.4.4. The Third-Party requests unusual contractual terms or payment arrangements that raise doubts under applicable local law, such as phased payments in cash, payments in foreign currency or payments in high-risk countries;

6.4.5. The Third Party is suggested by a public official who is competent to make a decision (or can influence the decision making) on which the feasibility or execution of the transaction/business depends;

6.4.6. The commission/remuneration of the Third Party, if any, exceeds fair and reasonable compensation for the service to be performed.

6.5. To ensure transparency, all payments made to Third Parties must:

6.7.1. Be made in accordance with jp.group's policies and procedures and in compliance with applicable local law;

6.7.2. Be made in accordance with established payment systems and properly accounted for;

6.7.3. Be made in accordance with the contracts entered into between the parties.

MONITORING

7. MONITORING AND CONTROL

7.1. jp.group maintains an internal control system of regulatory compliance, which shall be adjusted to the risks of corruption and related infractions specific to the activity carried out by each company that constitutes jp.group.

7.2. The jp.group management bodies are responsible for promoting the implementation of procedures and appropriate control systems for monitoring compliance with this Policy, any other legal or complementary standards approved and implemented in jp.group for the prevention of corruption and related infractions.

7.3. The Regulatory Compliance Officer ("RCN"), appointed by the Board of Directors, ensures the execution of the Regulatory Compliance Program, is responsible for assessing the quality and effectiveness of the control and monitoring systems and procedures in place for compliance with this Policy. It carries out its functions with independence and autonomy of decision, having access to internal information and to the technical and human resources necessary for the performance of its functions.

8. TRAINING

In order to ensure that their employees know and understand the standards set out in this Policy, jp.group will promote periodic training in the prevention of corruption, taught by people with the appropriate expertise.

9. INTERNAL WHISTLEBLOWING CHANNEL

9.1. All employees who have knowledge, or reasonable suspicion, of situations of non-compliance with the provisions of this Policy, other legal requirements, or that are contrary to the values of jp.group, shall report such situations through the internal channel for complaints, available at <https://report.whistleb.com/en/jphs>.

9.2. The receipt and forwarding of complaints follow the procedure for complaints set out in the Reporting and Handling of Complaints Policy available [HERE](#).

10. PROHIBITION OF RETALIATION

10.1. Anyone who, in good faith, reports practices that may constitute a violation of this Policy, internal policies or standards, or legal provisions, shall not be subject to retaliation, reprimand, or any unfavorable or discriminatory acts by jp.group or its contributors.

10.2. Any jp.group employee who believes to be a victim of acts that may be considered retaliation because of a complaint previously made, shall use the internal reporting channel to notify the occurrence, in order to enable the fastest resolution of the situation.

11. RESPONSIBILITY OF THE MANAGEMENT AND SENIOR MANAGEMENT

11.1. It is the responsibility of jp.group's management bodies to take all necessary measures, under applicable local law, to implement this policy.

11.2. jp.group, through its top management, shall ensure compliance and monitoring of this Policy, namely by ensuring the material and human resources and the necessary mechanisms:

11.2.1. To the monitoring of the adequacy, sufficiency and timeliness of the Policy and its procedures and controls;

11.2.2. The definition, monitoring and evaluation of the policy of internal training actions of jp.group;

11.2.3. The treatment and monitoring of complaints and reports of irregularities and violations of this Policy.

FINAL PROVISIONS

12. NON-COMPLIANCE

12.1. Failure to comply with this Policy will be considered a serious infringement, giving rise to the application of disciplinary and/or other legally applicable sanctions to the infringing employees.

12.2. Failure to comply with this Policy may also lead to administrative, civil, or criminal liability of the violators and result in the application of criminal sanctions, civil damages, as well as the application of accessory sanctions.

13. PUBLICATION AND VALIDITY

This Policy comes into force immediately after its approval and shall be reviewed every 3 years, or whenever appropriate and will be published on jp.hub and jp.group official website within 10 (ten) days after its implementation and / or its revisions.