



CRIMINAL COMPLIANCE POLICY

Estanislao Durán's Directors, aware of the convenience of defining and write up its Criminal Compliance Policy, have decided to implement a Criminal Compliance Management System, with the purpose of provide their services in accordance with what system procedures state, and to ensure to the stakeholders the compliance of the applicable criminal laws, as well as the requirements of the Criminal Compliance Management System.

Estanislao Durán's Criminal Compliance Policy establishes the obligation of:

- Compliance to the criminal laws applicable to the Company
- Prohibition of commission of criminal acts
- The minimal exposure of the Company to criminal risks
- The implementation of and adequate framework for the definition, revision and achievement of goals concerning Criminal Compliance
- The obligation of reporting suspicious conducts or facts concerning criminal risks, guaranteeing that the whistleblower will not suffer retaliation.
- Make a commitment to the continuous improvement of the Criminal Compliance Management System
- Grant the necessary authority and independence to the Criminal Compliance Body.
- The bearing of consequences of not complying with the requirements of this Policy, as well as those derived from the Criminal Compliance Management System.

This Policy is applicable in all activities in whose environment there could be crimes committed, which should be prevented. It is available as a documented information for the whole staff of E. Durán S.L. in the Compliance/Antibribery internal application of E. Durán.

Vigo, 15th December 2023

Ramiro José Cobo García - Cobo