



## FUNDICIÓN EN CÁSCARA, S.A. MEIN CORPORATE COMPLIANCE

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FUNDICION EN CÁSCARA, S.A., is a company specialized in the casting of steel parts (carbon steel, stainless steel, anti-wear, anti-abrasion, refractory, etc.) in medium and long series.

Our “Criminal Compliance System” (hereinafter “Compliance System”) includes as an essential concept that all the people who make up FUNDICIÓN EN CÁSCARA, S.A. MEIN carries out our activities with the commitment to comply with current legislation, with special reference to criminal law, as well as with the ethical principles contemplated in our internal regulations, in coherence with our values of quality and professionalism, and our culture of commitment. social, gender equality and transparency.

This “Criminal Compliance Policy” (hereinafter the “Policy”) establishes and communicates the objectives and general principles of action of the Compliance System.

### 1. Objectives:

The main objectives of the Compliance System of FUNDICIÓN EN CÁSCARA, S.A. MEIN are:

- a) **Promote a positive and constructive culture of business ethics** in FUNDICIÓN EN CÁSCARA, S.A. MEIN, which involves all the people who make up the company, based on the principle of “zero tolerance” towards the commission of illegal acts, regulatory breaches or any type of corruption, abuse or discrimination.
- b) **Comply with the different legal obligations and business diligence guidelines** in this matter, with special reference to European Union, state and regional regulations.
- c) **Prevent the commission of crimes and regulatory breaches** in the company, avoiding legal responsibilities (criminal, civil, etc.), the imposition of sanctions and fines and claims from third parties.



- d) **Increase the reputational capital** of FUNDICIÓN EN CÁSCARA, S.A. MEIN, avoiding risks and guaranteeing its value.
- e) **Consolidate the relationship with the most relevant “third parties of interest”**: clients, suppliers, project collaborators, public administrations, etc.
- f) **Anticipate the demands of the international market.**

Therefore, the Compliance System contributes to guaranteeing and increasing the value of FUNDICIÓN EN CÁSCARA, S.A. MEIN, and to protect the company against possible liabilities.

## 2. Scope of application

This Policy binds and applies, without exception and regardless of their position, responsibility, occupation or location, to all FUNDICIÓN EN CÁSCARA, S.A. MEIN personnel, in the terms defined by the applicable criminal regulations.

For the purposes of this Policy, they are included as “staff of FUNDICIÓN EN CÁSCARA, S.A. MEIN”, among others, people who are employees of the company, and other people who may act as collaborators of FUNDICIÓN EN CÁSCARA, S.A. MEIN with access to company resources, without having an employment relationship.

## 3. General Principles of Action

To achieve the objectives of the Compliance System of FUNDICIÓN EN CÁSCARA, S.A. MEIN establishes the following General Principles of Action:

- a) **Mandatory compliance** with applicable legislation, internal regulations and other regulations that are applicable to FUNDICIÓN EN CÁSCARA, S.A. MEIN depending on its activity (project bases, etc.).
- b) **Identification and evaluation of risks.** FUNDICION EN CÁSCARA, S.A. MEIN identifies and evaluates the different risks that exist due to its activity, and implements the necessary measures to mitigate or eliminate them.



- c) **Definition and implementation of appropriate procedures.** FUNDICION EN CÁSCARA, S.A. MEIN has policies, procedures and processes for crime prevention and regulatory non-compliance appropriate to its activity and structure.
- d) **Update of the Compliance System.** Continuous monitoring, analysis and updating of risks and procedures.
- e) **Training.** The staff of FUNDICIÓN EN CÁSCARA, S.A. MEIN receives sufficient training to know the objectives and operation of the company's Compliance System.
- f) **Obligation to report** possible illegal conduct or conduct that involves regulatory non-compliance: for this purpose, an Ethical Channel is established, accessible through the website <https://funcasa-mein.com/>, managed in the first instance by an external company. and fully guaranteeing its confidentiality.
- g) **Obligation to collaborate.** All the staff of FUNDICIÓN EN CÁSCARA, S.A. MEIN has the obligation to collaborate in any possible efforts or investigations that may have to be carried out to clarify the facts linked to the alleged infringements.
- h) **Provision of means.** FUNDICION EN CÁSCARA, S.A. MEIN will dedicate sufficient resources to achieve effective operation and continuous improvement of its Compliance System, with special reference to the duties of supervision, surveillance and control.
- i) **Control body.** FUNDICION EN CÁSCARA, S.A. MEIN has an internal body to supervise compliance with its Compliance System ("Compliance Officer").
- j) **Consequences of non-compliance.** FUNDICION EN CÁSCARA, S.A. MEIN will apply the disciplinary regime and will take the actions that correspond to it by law in the event of non-compliance of both a criminal nature and other applicable internal or legal regulations.
- k) **Communication.** This Policy and the company's Ethical Channel will be available to all interested parties through its corporate website <https://funcasa-mein.com>. Likewise, they will be the subject of communication actions for their adequate understanding and implementation.



#### 4. Update and revision

This Policy will be reviewed and updated periodically, in order to adapt it to regulatory changes and those that may arise in the activities of FUNDICIÓN EN CÁSCARA, S.A. MEIN, guaranteeing at all times its effective implementation.

#### 5. Approval and validity

This Policy has come into force at the time of its approval by the sole Administrator of FUNDICIÓN EN CÁSCARA, S.A. MEIN dated November 28, 2023 and will be applicable in the established terms and until its update, revision or repeal is approved.

In Ezkio-Itxaso (Guipúzcoa), November 28, 2023.

Signed: Mr. Gurutz Franco Leiza

Representative of the sole Administrator

Central de Gestión de Servicios Guipúzcoa, S.L